

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

<i>e</i> PLUS INC.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:09CV620 (REP)
)	
LAWSON SOFTWARE, INC.,)	
)	
Defendant.)	

**JOINT FILING OF LIST OF WITNESSES, EXHIBITS, AND DEPOSITION
DESIGNATIONS FOR CONTEMPT PROCEEDINGS**

Pursuant to the Court's Scheduling Order entered on March 12, 2013 (D.I. 1020) Plaintiff *e*Plus Inc. ("ePlus") and Defendant Lawson Software, Inc. ("Lawson") hereby jointly submit the following documents:

1. Appendix 1 - List of Witnesses that are agreed upon
2. Appendix 2 - List of Exhibits that are agreed upon
3. Appendix 3 - List of Exhibits that are subject to objection by ePlus
4. Appendix 4 - List of Exhibits that are subject to objection by Lawson
5. Appendix 5 – ePlus's Deposition Designations for Dean J. Hager with Lawson's objections and counter-designations
6. Appendix 6 - ePlus's Deposition Designations for Kenneth Farber

DATED: March 20, 2013

/s/

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Attorneys for Plaintiff *ePlus Inc.*

DATED: March 20, 2013

LAWSON SOFTWARE, INC.

By: _____ /s/ _____

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Counsel for Defendant Lawson Software, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of March, 2013, I will electronically file the foregoing

**JOINT FILING OF LIST OF WITNESSES, EXHIBITS, AND DEPOSITION
DESIGNATIONS FOR CONTEMPT PROCEEDINGS**

with the Clerk of Court using the CM/ECF system which will then send a notification of such filing (NEF) via email to the following:

<p>Christopher Dean Dusseault, <i>pro hac vice</i> Jason Lo, <i>pro hac vice</i> Timothy P. Best, <i>pro hac vice</i> GIBSON, DUNN & CRUTCHER LLP 333 S. Grand Avenue Los Angeles, CA 90071 Telephone: (213) 229-7000 Facsimile: (213) 229-6659 CDusseault@gibsondunn.com JLo@gibsondunn.com TBest@gibsondunn.com VAED-620ExternalServiceList@gibsondunn.com</p>	<p>Robert A. Angle, VSB#37691 Dabney J. Carr, IV, VSB #28679 Megan C. Rahman (VSB No. 42678) Timothy J. St. George (VSB No. 77349) TROUTMAN SANDERS LLP P.O. Box 1122 Richmond, Virginia 23218-1122 Telephone: (804) 697-1238 Facsimile: (804) 698-5119 robert.angle@troutmansanders.com dabney.carr@troutmansanders.com megan.rahman@troutmansanders.com tim.stgeorge@troutmansanders.com</p>
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PLAINTIFF ePLUS'S WITNESS LIST

	<u>Name</u>	<u>Address</u>	<u>Purpose</u>
1.	Dale Christopherson	Lawson Software, Inc. 380 Saint Peter Street St. Paul, MN 55102	Fact
2.	Dean Hager	Kroll Ontrack 9023 Columbine Road Eden Prairie, MN 55347	Fact
3.	Scott Hanson	Lawson Software, Inc. 380 Saint Peter Street St. Paul, MN 55102	Fact
4.	Keith Lohkamp	3045 Totterdell Street Oakland, CA 94611	Fact
5.	Alfred Weaver, Ph.D.	University of Virginia School of Engineering and Applied Sciences 151 Engineer's Way P.O. Box 400470 Charlottesville, VA 22904	Expert
6.	Keith Ugone, Ph.D.	Analysis Group 2911 Turtle Creek Boulevard Suite 600 Dallas, TX 75219	Expert

DEFENDANT LAWSON'S WITNESS LIST

	Name	Address	Purpose
1.	Dale Christopherson	Lawson Software, Inc. 380 Saint Peter Street St. Paul, MN 55102	Fact
2.	Benjamin Goldberg, Ph.D.	New York University Department of Computer Science 251 Mercer Street, Room 401 New York, NY 10012	Expert
3.	Kenneth Farber (by deposition)	ePlus, Inc. 13595 Dulles Technology Drive Herndon, VA 20171	Fact
4.	Dean Hager (by deposition)	Kroll Ontrack 9023 Columbine Road Eden Prairie, MN 55347	Fact
5.	Elizabeth Homewood	Lawson Software, Inc. 380 Saint Peter Street St. Paul, MN 55102	Fact
6.	Keith Lohkamp	Lawson Software, Inc. 380 Saint Peter Street St. Paul, MN 55102	Fact
7.	Jonathan Putnam, Ph.D.	Competition Dynamics 125 Washington Street #202 Salem, MA 01970-3535	Expert
8.	Kevin Samuelson	Backcountry.Com 1678 Redstone Center Drive Park City, Utah 84098-7614	Fact

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LIST OF EXHIBITS THAT ARE AGREED UPON

Plt. No.	Def. No.	Begin Bates	End Bates	Date	Exhibit Description
PX-1	DX-543				U.S. Patent No. 6,023,683
PX-109	DX-683			7/9/2009	Lawson Annual 10-K Forms (2009)
PX-367	DX-734	ePLUS0942359	ePLUS0942599	4/22/2010	ePlus screenshots of RSS punchout demo
PX-379	DX-735	ePLUS0948949	ePLUS0948998	5/3/2010	ePlus screenshots of RSS Item Master/punchout demo
PX-440	DX-684			7/15/2010	Lawson Annual 10-K Forms (2010)
PX-690	DX-681				<i>The Forrester Wave: eProcurement Solutions , Q1 2011</i>
PX-1000	DX-626	RQC0000001	RQC0000046		Lawson Procurement Punchout and PO Dispatcher Installation and Administration Guide for Lawson Applications 8.1.x and 9.x Version 9.0.1.4 2011.12.19 Deposition of Dale Christopherson - Exhibit 05 - Lawson Procurement Punchout and PO Dispatcher Installation and Administration Guide for Lawson Application Guide for Lawson Applications 8.1X and 9.X
PX-1002	DX-693	RQC0000638	RQC0000655	6/3/2011	“Introducing Lawson Requisition Center Webinar (June 3, 2011) Questions And Answers” 2011.12.19 Deposition of Dale Christopherson - Exhibit 07 - Introducing Lawson Requisition Center Webinar
PX-1003		RQC0000691	RQC0000694		2011.12.19 Deposition of Dale Christopherson - Exhibit 8 & 2012.02.02 Deposition of Benjamin Goldberg - Exhibit 03 Lawson Requisition Center and Procurement Punchout
PX-1004		RQC0914392	RQC0914395	2/7/2011	2011.12.19 Deposition of Dale Christopherson - Exhibit 11 - S-3 RSS/Punchout and M3 Battle Plan Against ePlus
PX-1010	DX-624	RQC0000656	RQC0000690	6/3/2011	Introducing Lawson Requisition Center
PX-1011	DX-625	RQC0000695	RQC0000708	5/1/2011	Lawson Requisition Center Overview

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Plt. No.	Def. No.	Begin Bates	End Bates	Date	Exhibit Description
PX-1012	DX-594	RQC0000384	RQC0000384	5/1/2011	2011.12.19 Deposition of Dale Christopherson – Exhibit 20 – Lawson Requisition Center User Guide, Version 9.0.1 2011.12.19 Deposition of Dale Christopherson - Exhibit 20 - Lawson Requisition Center User Guide Version 9.0.1
PX-1013		RQC0377104	RQC03771105	2/14/2011	2011.12.19 Deposition of Dale Christopherson - Exhibit 21 & 2012.01.06 Deposition of Keith Lohkamp - Exhibit 5 - Email from D. Christopherson to K. Lohkamp, K. Knuth , T. Dooner RE: Analysis of claims from ePlus
PX-1014		RQC0868679	RQC0868679	2/14/2011	2011.12.19 Deposition of Dale Christopherson - Exhibit 22 - Email from D. Christopherson to K. Lohkamp and D. DeLancey Re: Initial thoughts on the 683 patent infringement by Punch-out
PX-1015		RQC0364468	RQC0364472	2/24/2011	2011.12.19 Deposition of Dale Christopherson - Exhibit 23 & 2012.01.06 Deposition of Keith Lohkamp - Exhibit 6 - Email from D. Christopherson to K. Lohkamp FW: Initial thoughts on the 683 patent infringement by Punch-out / Use of RSS configuration to control vendor access commentary
PX-1019	DX-605	RQC2291408	RQC2291410	4/25/2011	2012.01.06 Deposition of Keith Lohkamp – Exhibit 7 – Email from K. Lohkamp to D. Snyder, D. Kemper, J. Langer RE: Please Read: Additional suggested change to the Requisition Center 2011.12.20 Deposition of Dale Christopherson - Exhibit 27 & 2012.01.06 Deposition of Keith Lohkamp - Exhibit 7 - Email from K. Lohkamp to D. Snyder, D. Kemper, J. Langer RE: Please Read: Additional suggested change to the Requisition Center

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Plt. No.	Def. No.	Begin Bates	End Bates	Date	Exhibit Description
PX-1020		RQC0010154		May 5, 2011	2011.12.20 Deposition of Dale Christopherson - Exhibit 28 - Email from D. Christopherson to J. Mulchrone RE: So the big question is...
PX-1021		RQC2273418	RQC2273419	6/3/2011	2011.12.20 Deposition of Dale Christopherson - Exhibit 29 - Email from D. Hager to K. Lohkamp, J. Langer RE: Need Decision and Input on New Requested Change to RQC Related to Procurement Punchout
PX-1022		RQC0007676	RQC0007681	6/22/2011	2011.12.20 Deposition of Dale Christopherson - Exhibit 30 & 2012.02.02 Deposition of Benjamin Goldberg - Exhibit 11 - Email from D. Christopherson to K. Lohkamp RE: Cleveland Clinic: Questions
PX-1024		RQC0008161	RQC0008162	6/1/2011	2011.12.20 Deposition of Dale Christopherson - Exhibit 34 - Email from D. Christopherson to K. Lohkamp and I. Svensson RE: Mayo RQC Questions
PX-1026		RQC0008104	RQC0008104	6/2/2011	2011.12.20 Deposition of Dale Christopherson - Exhibit 36 & 2012.01.06 Deposition of Keith Lohkamp - Exhibit 21 - Email from D. Christopherson to K. Lohkamp RE: REQ Center
PX-1030		RQC0008088-89	RQC0008089	6/2/2011	2011.12.20 Deposition of Dale Christopherson - Exhibit 40 - Email from D. Christopherson to M. Bragstad RE: Changes being brought with Req Center
PX-1033	DX-561	RQC0109373	RQC0109373	10/5/2011	2011.12.21 Deposition of Elizabeth Homewood – Exhibit 04 – Spreadsheet – Customer List Deposition of Scott Hanson - Exhibit 7 & 2012.01.05 Deposition of Kevin Samuelson - Exhibit 13 - Spreadsheet - Customer List
PX-1035	DX-563	RQC0561907	RQC0561909		2011.12.21 Deposition of Elizabeth Homewood – Exhibit 06 – “Timeline for ePlus Patent Litigation (ERH)”
PX-1037	DX-557	RQC0000636	RQC0000637	6/3/2011	2011.12.21 Deposition of Elizabeth Homewood – Exhibit 08 – “Decommission Notice – S3 Requisitions Self-Service”

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Plt. No.	Def. No.	Begin Bates	End Bates	Date	Exhibit Description
PX-1038		RQC02657684	RQC02657687	9/6/2011	2011.12.21 Deposition of Elizabeth Homewood - Exhibit 09 - Email from D. Hager to K. Lohkamp Re: Update on RQC/ePlus Communications
PX-1039		RQC0801464	RQC0801466	6/16/2011	2011.12.21 Deposition of Elizabeth Homewood - Exhibit 10 - Email from L. Durham, Priority health to M. Anderson, et al. Re Lawson Global Support – ePlus Patent Litigation
PX-1041	DX-707	RQC0117312	RQC0117313	6/7/2011	Calendar Invite from Jennifer Langer Re: RQC Team: Legal requested changes to Punch-out . . . 2011.12.21 Deposition of Elizabeth Homewood - Exhibit 12 - Q&A Session with Dean Hagar-Introduces Lawson Requisition Center
PX-1042		RQC0801547	RQC0801548	6/4/2011	2011.12.21 Deposition of Elizabeth Homewood - Exhibit 13 - Email from D. Diehl to M. Anderson RE: RQC reminder for teams
PX-1045		N/A	N/A		2011.12.21 Deposition of Todd Dooner - Exhibit 101 - RSS/RQC Difference Details
PX-1049	DX-696	RQC2154688	RQC2154689	4/21/2011	Email from Dale Christopherson to Keith Lohkamp and Todd Dooner Re: Here is the concept 2011.12.21 Deposition of Todd Dooner - Exhibit 113 - Email from B. Crawford to B. McPheeters RE: Possible Modification to code per Dale FW: Here is the concept
PX-1050		RQC0117866	RQC0117867	6/6/2011	2011.12.21 Deposition of Todd Dooner - Exhibit 114 - Email from M. Klebe to M. Bragstad RE: Heads up on RQC Change
PX-1055		RQC0008253	RQC0008253	5/26/2011	2011.12.21 Deposition of Todd Dooner - Exhibit 126 - Email from D. Christopherson to T. Dooner and K. Lohkamp RE: RSS to RQD KB article# 5434646
PX-1056		RQC0905555	RQC0905593	6/27/2011	2011.12.29 Deposition of Scott Hanson - Exhibit 04 - Email from K. Ross to M. Tincher RE: Updated Chronology, with attachment: Intro to Requisition Center Webinar 060311 Powerpoint

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Plt. No.	Def. No.	Begin Bates	End Bates	Date	Exhibit Description
PX-1057		RQC2609830	RQC2609832		2011.12.29 Deposition of Scott Hanson - Exhibit 05 - Email from D. Christopherson to L. Gregg and P. Wright FWD: Q&A from Friday Webinar - Current Version, with attached spreadsheet
PX-1058		RQC0114812-19 RQC0115250-59 RQC0113787-94 RQC0113785-86 RQC0113842-46 RQC0114257-59	RQC0114812-19 RQC0115250-59 RQC0113787-94 RQC0113785-86 RQC0113842-46 RQC0114257-59		2011.12.29 Deposition of Scott Hanson - Exhibit 08 - Excerpts from Support Ticket Files
PX-1059	DX-591	RQC0000364	RQC0000379	6/1/2011	2011.12.29 Deposition of Scott Hanson – Exhibit 08 – Lawson Requisition Center Installation Guide, Version 9.0.1 (Unix/Windows)
PX-1060	DX-585	RQC0109375	RQC0109375		2011.12.29 Deposition of Scott Hanson – Exhibit 10 – “RQC SWAT Cases” spreadsheet
PX-1061	DX-593	RQC0109374	RQC0109374		2011.12.29 Deposition of Scott Hanson – Exhibit 11 – “RQC SWAT Activities” spreadsheet
PX-1062		RQC0021754	RQC0021756	6/24/2011	2011.12.29 Deposition of Scott Hanson - Exhibit 13 - Email from S. Hanson to J. Catalino, M. Jokinen and R. Graham RE: RSS to RQC Services Reserve Calculation
PX-1065		RQC00019999	RQC00020001	9/1/2011	2011.12.29 Deposition of Scott Hanson - Exhibit 16 - Email from S. Hanson to W. Schulte RE: Kennedy Health (4788) – RQC Consulting Time
PX-1066		RQC0013417	RQC0013417	6/30/2011	2011.12.29 Deposition of Scott Hanson - Exhibit 17 - Email from J. Healey to S. Hanson RE: Question Heartland
PX-1068	DX-623	RQC0870774	RQC0870777	6/2/2011	Email from K. Lohkamp to D. Davidson Re: RSS to Req Center Upgrade 2011.12.29 Deposition of Scott Hanson - Exhibit 19 - Email from K. Lohkamp to D. Davidson Re: RSS to Req Center Upgrade

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Plt. No.	Def. No.	Begin Bates	End Bates	Date	Exhibit Description
PX-1069		RQC0920551	RQC0920556	6/3/2011	2011.12.29 Deposition of Scott Hanson - Exhibit 20 - Email from S. Hanson to D. Davidson RE: Action item: need immediate letter to Partners
PX-1070		RQC0019869	RQC0019870	9/21/2011	2011.12.29 Deposition of Scott Hanson - Exhibit 21 - Email from S. Hanson to C. Miliner RE: RSS/RQC differences documentation
PX-1072		RQC0014103	RQC0014104	6/8/2011	2011.12.29 Deposition of Scott Hanson - Exhibit 25 - Email from C. Walters to S. Hanson RE: RSS – RQC Customer testing
PX-1073		RQC0055932	RQC0055933	5/26/2011	2011.12.29 Deposition of Scott Hanson - Exhibit 26 - Email from J. Langer to H. Debes RE: more customer feedback on Requisition Center...reinforces Harry's message
PX-1074		RQC2741646	RQC2741646	7/3/1905	2012.01.05 Deposition of Kevin Samuelson - Exhibit 04 - Spreadsheet – P & L, FY 2011
PX-1077	DX-643	N/A	N/A	5/31/2011	2012.01.05 Deposition of Kevin Samuelson – Exhibit 7: Lawson US FY11 (May 31, 2011) Actual P&L Profit by Revenue Type
PX-1078	DX-644				2012.01.05 Deposition of Kevin Samuelson – Exhibit 8: Product SKUs
PX-1079		RQC0838864	RQC0838864		2012.01.05 Deposition of Kevin Samuelson - Exhibit 09 - Spreadsheet – S3HCM
PX-1080		RQC2741643	RQC2741643	7/3/1905	2012.01.05 Deposition of Kevin Samuelson - Exhibit 10 - License Revenue Spreadsheet
PX-1081		RQC2741644	RQC2741644	7/3/1905	2012.01.05 Deposition of Kevin Samuelson - Exhibit 12 - Maintenance Revenue Spreadsheet
PX-1082		RQC2741645	RQC2741645	7/3/1905	2012.01.05 Deposition of Kevin Samuelson - Exhibit 15 - Service Revenue Spreadsheet
PX-1088	DX-549	RQC2282399	RQC2282402	3/7/2011	2012.01.06 Deposition of Dean Hager – Exhibit 4 – Email from Mike Cohen to Bruce McPheeters FWD: CUE Demo Plans, need help

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Plt. No.	Def. No.	Begin Bates	End Bates	Date	Exhibit Description
PX-1090	DX-550	RQC0026599	RQC0026602	3/25/2011	2012.01.06 Deposition of Dean Hager – Exhibit 6 & 2012.01.06 Deposition of Keith Lohkamp – Exhibit 9 – Email from K. Lohkamp to D. Hager RE: Questions
PX-1091		RQC0328897	RQC0328898	3/30/2011	2012.01.06 Deposition of Dean Hager - Exhibit 07 - Email from P. Miele to J. Millar RE: ePlus Litigation – URGENT ACTION for you
PX-1096	DX-556	RQC0914942	RQC0914945	6/9/2011	2012.01.06 Deposition of Dean Hager – Exhibit 12 & 2012.01.06 Deposition of Keith Lohkamp – Exhibit 8 – Email from D. Christopherson to D. Hager, B. McPheeters et al. RE: RQC Patch 1 updated
PX-1098		RQC0813754	RQC0813755	5/26/2011	2012.01.06 Deposition of Dean Hager - Exhibit 14 - Email from D. Hager to H. Debes RE: Another Customer Letter
PX-1100		RQC0848776	RQC0848779	5/26/2011	2012.01.06 Deposition of Dean Hager - Exhibit 16 - Email from M. Poling to D. Hager RE: Update on Requisition Center and Punchout – Sutter
PX-1101		RQC2076740	RQC2076743	6/1/2011	2012.01.06 Deposition of Dean Hager - Exhibit 17 - Email from M. Tincher RE: Moving Up to RQC – large project team w/ Attachment RSS Injunction Battle Plan Spreadsheet
PX-1102		RQC0907446	RQC0907460	June 2011	2012.01.06 Deposition of Dean Hager - Exhibit 18 - RQC Presentation – Webinar re: court order requiring immediate replacement of RQSS w/RQ Center
PX-1104	DX-558	RQC0000732	RQC0000738	5/27/2011	“Immediate replacement of Requisitions Self Service software products required.” 2012.01.06 Deposition of Dean Hager - Exhibit 21 & 2012.01.09 Deposition of Kurt Reasoner - Exhibit 2 - H. Debes letter RE: Immediate replacement of RSS software products required
PX-1105	DX-607	RQC0869062	RQC0869093	6/3/2011	Deposition of Keith Lohkamp – Exhibit 11 – Email from J. Langer to N. Anderson FW: LRC webinar follow-up: questions and recordings w/ attachment LRC Question and Answers.txt

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Plt. No.	Def. No.	Begin Bates	End Bates	Date	Exhibit Description
Px-1111	DX-552	RQC2091954	RQC2091959	5/26/2011	2012.01.06 Deposition of Dean Hager – Exhibit 28 – Email from Jennifer Langer to Guy Leduc et al. FW: Supporting Materials for Mtg 2:00 – RE: project team for ePlus (and attachment)
PX-1112		RQC0612952	RQC0612952	5/26/2011	2012.01.06 Deposition of Dean Hager - Exhibit 29 - Email from D. Hager to T. Blake - Content for Prospect Letter
PX-1113	DX-606	RQC0883191	RQC0883229	6/3/2011	2012.01.06 Deposition of Keith Lohkamp – Exhibit 10 – Presentation: Introducing Lawson Requisition Center
PX-1115	DX-609	RQC0590893	RQC0590903	5/2/2011	2012.01.06 Deposition of Keith Lohkamp – Exhibit 13 – Email and attachment, Lawson Requisition Center, How To Sell
PX-1116	DX-610	RQC2300171	RQC2300173	5/18/2011	2012.01.06 Deposition of Keith Lohkamp – Exhibit 14 – Email from D. Christopherson to D. Kempker, J. Langer et al. RE: Recommendation on next steps for RSS and RQC
PX-1117		RQC2256291	RQC2256305	6/7/2011	2012.01.06 Deposition of Keith Lohkamp - Exhibit 15 - Email from D. Christopherson to J. Mulchrone and T. Dooner FW: Updated FAQs for Legal Review and Posting on Globe
PX-1152	DX-590	RQC0000348	RQC0000363	5/1/2011	Lawson Requisition Center Installation Guide, Version 9.0.1 (IBM)
PX-1153		RQC0000380	RQC0000383	May 2011	Requisition Center Release Notes
PX-1154		RQC0000434	RQC0000635	June 2011	Requisitions User Guide
PX-1155	DX-695	RQC0000709	RQC0000721	6/9/2011	“Lawson Requisition Center What’s New and Different”
PX-1156	DX-568	RQC0000722	RQC0000722	5/18/2011	“Lawson S3 Requisition Center is generally available today – May 18th, 2011.”
PX-1157		RQC0000723	RQC0000723	7/3/1905	Lawson Requisition Center: Courses from Lawson Learning
PX-1159	DX-533	RQC0000730	RQC0000730	June 2011	“Important Notice: Recommended Patch Available for Procurement Punchout Customers”
PX-1160	DX-534	RQC0000731	RQC0000731	June 2011	“Patch for Requisition Center 9.0.1 Now Available”
PX-1161		RQC0000739	RQC0000739	7/12/2011	Lawson Website Requisition Center Screenshot
PX-1162		RQC0000740	RQC0000740	May 2011	Lawson Requisition Center Overview Video
PX-1163		RQC0000741	RQC0000741	6/3/2011	Requisition Center Training Course

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Plt. No.	Def. No.	Begin Bates	End Bates	Date	Exhibit Description
PX-1164		RQC0000742	RQC0000742		Video Message From Dean Hager on "Requisition Center"
PX-1165		RQC0000743	RQC0000743	6/3/2011	Lawson WebEx With Customers Concerning RQC
PX-1178	DX-710	RQC0010354	RQC0010357	4/26/2011	Email from Dale Christopherson FW: How did testing go?
PX-1191		RQC0109447	RQC0109447		Lawson Customer List
PX-1195	DX-586	RQC0111357	RQC0111366	8/22/2011	"Lawson Consulting Services – RQC SWAT Team Financial Update"
PX-1201		RQC0653558	RQC0653559	6/7/2011	Email from J. Langer to J. Langer, S. Merten et al. RE: RQC Team: Legal requested changes to Punch-out will be included in forthcoming RQC patch
PX-1203		RQC0823069	RQC0823069		Spreadsheet of Customers" Status
PX-1205		RQC0836445	RQC0836451	6/2/2011	Email from S. Hanson to D. Smith RE: Lawson / e-Plus litigation update
PX-1206		RQC0843442	RQC0843447	6/1/2011	Email from M. Vance to I. Svensson RE: A message from Dean Hager - RQC now available free of charge to replace RSS
PX-1234		RQC1003017	RQC1003019	9/19/2011	Email from D. Christopherson to W. Schultz and T. Dooner re Information Request
PX-1235	DX-737	RQC1003184	RQC1003185	6/7/2011	Email string from J. Langer to B. McPheeters, K. Lohkamp and M. Cohen re: Need Guidance on Patch
PX-1241		RQC2741737	RQC2741737	8/31/2012	Lawson License Revenue - 8-31-12
PX-1242		RQC2741738	RQC2741738	8/31/2012	Lawson Maintenance Revenue - 8-31-12
PX-1243		RQC2741739	RQC2741739	8/31/2012	Lawson Services Revenue - 8-31-12
PX-1244	DX-711	RQC2741740		10/31/2012	USA PL FY12 10-31-12 – 2012 P&L Statement
PX-1245	DX-712	RQC2741741		12/1/11 - 8/31/12	Lawson Revenue SKU Report ALL Data – 8-31-12
PX-1246		RQC2741742	RQC2741742	11/30/2012	Lawson License Revenue - 11-30-12
PX-1247		RQC2741743	RQC2741743	11/30/2012	Lawson Maintenance Revenue - 11-30-12
PX-1248		RQC2741744	RQC2741744	11/30/2012	Lawson Service Revenue - 11-30-12
PX-1249	DX-713	RQC2741745		11/30/2012	Lawson Revenue SKU Report All Data - 11-30-12
PX-1250	DX-736	RQC3000243	RQC3000244	6/3/2011	Email string from D. Christopherson to J. Mulchrone and B. Crawford FW: Changes RSS to RQC

LIST OF EXHIBITS THAT ARE AGREED UPON

Plt. No.	Def. No.	Begin Bates	End Bates	Date	Exhibit Description
PX-1254		RQC3002676	RQC3002677(with attach)	6/9/2011	Email from J. Ekelin to D. Christopherson, E. Homewood, M. Cohen, S. Merten, K. Lohkamp, and J. Langer re Q&A from Friday Webinar - Latest Version
PX-1255		RQC3002775	RQC3002778	6/7/2011	Email from D. Christopherson to D. Hager, B. McPheeeters, K. Lohkamp, J. Langer, M. Cohen and J. Mulchrone re Need Decision and Input on New Requested Change to RQC Related to Procurement Punchout
PX-1267		RQC0893666	RQC0893666	5/26/2011	Letter from D. Hager to Summa Health System - Attachment to RQC0893665_00001
PX-1269		N/A	N/A	10/7/2011	2011.12.29 Deposition of Scott Hanson – Exhibit 06 – Defendant Lawson Software, Inc.’s Answers to Plaintiff ePlus Inc.’s First Set of Interrogatories for Contempt Proceedings
PX-1270		N/A	N/A	10/24/2011	2011.10.24 Defendant Lawson Software, Inc.’s Supplemental Responses to Plaintiff ePlus Inc.’s First Set of Interrogatories for Contempt Proceedings (Interrogatory No. 5)
DX-559	RQC0762337	RQC0762343		6/1/2011	“Immediate replacement of Requisitions Self Service software products required.”
DX-608	RQC0117217	RQC0117227		4/8/2011	Requisition Center Launch Project Charter
DX-628	RQC2270553	RQC2270554		6/10/2011	Email from D. Christopherson re Q&A and Patch 1
DX-631	RQC0118131				Lawson Requisition Center User Guide
DX-690	RQC1000122	RQC1000123		6/3/2011	Email from Dale Christopherson to Todd Dooner Fwd: Updated on Requested Change to Requisition Center related to punchout
DX-691	RQC1000157			6/1/2011	Email from Dale Christopherson to John Mulchrone FW: Change to Punchout
DX-694	RQC2270553	RQC2270574		6/10/2011	Email from Dale Christopherson FW: For Legal Review – Q&A from Friday Webinar + Attachment
DX-698	RQC1000847	RQC1000848		2/1/2011	Calendar Invite from Bruce McPheeeters Re: Important ePlus patent suit Planning meeting – Please Attend

LIST OF EXHIBITS THAT ARE AGREED UPON

Plt. No.	Def. No.	Begin Bates	End Bates	Date	Exhibit Description
	DX-701	RQC1000376		3/31/2011	Email from Dale Christopherson to Guenther Tolkmitt RE: do you want to be updated on the RSS replacement project

Cr r gpf kz 5

PLAINTIFF ePLUS INC.'S SPECIFIC OBJECTIONS TO DEFENDANT LAWSON SOFTWARE, INC.'S LIST OF AFFIRMATIVE CONTEMPT HEARING EXHIBITS

Def. No.	Plt. No.	Begin Bates	End Bates	Date	Exhibit Description	106	401/402	403	801/802/ 805	901	1006	FRCP 26	MIL	NR	INACC	NOT EVIDENCE
DX-500				1/27/2011	Signed verdict form		X							X		
DX-501				1/4/2011	Transcript of merits trial (Opening Statement) (pages 112-196)	X	X		X				X			
DX-502				1/4/2011	Transcript of merits trial (Testimony of Douglas Momyer) (pages 216-399)	X	X		X				X			
DX-503				1/5/2011	Transcript of merits trial (Testimony of Jim Johnson) (pages 448-480)	X	X		X				X			
DX-504				1/5/2011	Transcript of merits trial (Testimony of Alfred Weaver) (pages 482-510)	X	X		X				X			
DX-505				1/6/2011	Transcript of merits trial (Testimony of Alfred Weaver) (pages 517-922)	X	X		X				X			
DX-506					WITHDRAWN											
DX-507					WITHDRAWN											
DX-508					WITHDRAWN											
DX-509					WITHDRAWN											
DX-510					WITHDRAWN											
DX-511				1/13/2011	Transcript of merits trial (Testimony of Michael Shamos) (pages 1723-1778)	X	X		X				X			
DX-512				1/14/2011	Transcript of merits trial (Testimony of Michael Shamos) (pages 1792-1948)	X	X		X				X			
DX-513				1/20/2011	Transcript of merits trial (Testimony of Brooks Hilliard) (pages 2656-2792)	X	X		X				X			
DX-514				1/24/2011	Transcript of merits trial (Closing Arguments) (pages 3085-3230)	X	X		X				X			
DX-515					WITHDRAWN											
DX-516					WITHDRAWN											
DX-517					WITHDRAWN											
DX-518					WITHDRAWN											
DX-519					WITHDRAWN											
DX-520					WITHDRAWN											
DX-521	PX-368			1/20/2012	Golberg Report Ex. 3 – Video – Weaver Merits Trial Two Punchout demonstration								X			
DX-522	PX-380			1/20/2012	Goldberg Report Ex. 4 – Video – Weaver Merits Trial Item Master / Punchout demonstration								X			
DX-523				1/20/2012	Goldberg Report Ex. A – Goldberg CV					X						
DX-524					WITHDRAWN											
DX-525	PX-1166	RQC0000744	RQC0000744		Source code	X	X	X					X		X	
DX-526	PX-1167	RQC0000745	RQC0000745		Source code	X	X	X					X		X	
DX-527	PX-1172	RQC0000746	RQC0000746		Source code differences file	X	X	X					X		X	
DX-528	PX-1168	RQC0000747	RQC0000747		Source code	X	X	X					X		X	
DX-529	PX-1169	RQC0000748	RQC0000748		"Lawson 4GL Diff Document"	X	X	X					X		X	
DX-530	PX-1173	RQC0000749	RQC0000749		Source code differences file	X	X	X					X		X	
DX-531	PX-1170	RQC0000750	RQC0000750		Source code differences file	X	X	X					X		X	
DX-532	PX-1171	RQC0000751	RQC0000751		Source code differences files	X	X	X					X		X	
DX-535				5/6/2011	Letter from Daniel McDonald to Scott Robertson re: ePlus, Inc. v. Lawson Software, Inc.		X	X	X							X
DX-536				5/18/2011	Letter from Daniel McDonald to Scott Robertson re: ePlus, Inc. v. Lawson Software, Inc.		X	X	X							X
DX-537				6/16/2011	Letter from Scott Robertson to Daniel McDonald re: ePlus, inc. v. Lawson Software, Inc.		X	X	X							X
DX-538				6/24/2011	Letter from Scott Robertson to Daniel McDonald re: ePlus inc. v. Lawson Software, Inc.		X	X	X							X
DX-539				6/28/2011	Letter from Daniel McDonald to Scott Robertson re: ePlus Inc. v. Lawson Software, Inc.		X	X	X							X

PLAINTIFF ePLUS INC.'S SPECIFIC OBJECTIONS TO DEFENDANT LAWSON SOFTWARE, INC.'S LIST OF AFFIRMATIVE CONTEMPT HEARING EXHIBITS

Def. No.	Plt. No.	Begin Bates	End Bates	Date	Exhibit Description	106	401/402	403	801/802/ 805	901	1006	FRCP 26	MIL	NR	INACC	NOT EVIDENCE
DX-540				7/1/2011	Letter from Scott Robertson to Daniel McDonald re: ePlus, inc. v. Lawson Software, Inc.		X	X	X							X
DX-541				7/6/2011	Letter from Daniel McDonald to Scott Robertson re: ePlus Inc. v. Lawson Software, Inc.		X	X	X							X
DX-542					WITHDRAWN											
DX-544					WITHDRAWN											
DX-545				1/4/2011	Weaver Trial Demonstratives	X	X	X					X			
DX-546				3/30/2011	Lawson Opposition to Motion for Permanent Injunction		X	X	X	X						
DX-547				4/1/2011	ePlus Reply to Motion for Permanent Injunction		X	X	X							
DX-548				4/4/2011	Transcript of April 4, 2011 injunction hearing	X	X	X	X							
DX-551		RQC0054042	RQC0054042	5/10/2011	Email from Jim Catalino to Dean Hager RE: Anything on e-Plus? I have staff meeting and wanted to provide update thx		X	X	X							
DX-553		RQC2125837	RQC2125837	4/13/2011	Email from Brad Nauman to Jeff Hvass et al. FW: ePlus		X	X	X							
DX-554		RQC0922446	RQC0922446	4/25/2011	Email from Dean Hager to Darci Snyder Re: Clarity on mobile reqs		X	X	X							
DX-555		RQC0870441	RQC0870443	5/9/2011	Email from Jennifer Langer to Michael Poling et al. URGENT: Your Action Required for Q4 Opportunities and Beyond (S3 Requisitions Self Service)		X		X							
DX-560		RQC0000724	RQC0000725	5/27/2011	"Immediate Support Stop for M3 e-Procurement solution required."		X		X							
DX-562				12/19/2011	Spreadsheet – Customer List (update of October 5, 2011 version)		X			X	X	X		X		
DX-562A				3/15/2013	Summary Chart of Lawson US Customers with Configuration 3 and 5 on Active Maintenance as of May 23, 2011		X			X	X	X		X		
DX-564					WITHDRAWN											
DX-565		RQC2076749	RQC2076750	5/29/2011	Email from N. Anderson to R. Umali et al. re: PLEASE READ – Important Content		X	X	X							
DX-566		RQC0915427	RQC0915428	6/1/2011	Email from E. Homewood to N. Anderson RE: ePlus – Status Update		X	X	X							
DX-567		RQC0004126	RQC0004126	6/2/2011	Email from E. Homewood to ORG-All Support & Delivery re: IMPORTANT – PLEASE READ: Knowledge Base unavailable externally		X	X	X							
DX-569		RQC0915431	RQC0915432		"External Communications"		X	X	X	X						
DX-570					WITHDRAWN											
DX-571		RQC0113765	RQC0113775		Excerpt from "Cases with RSS Dialogue"	X	X	X	X	X						
DX-572					WITHDRAWN											
DX-573					WITHDRAWN											
DX-574		RQC0113826	RQC0113829		Excerpt from "Cases with RSS Dialogue"	X	X	X	X	X						
DX-575					WITHDRAWN											
DX-576		RQC0113869	RQC0113870		Excerpt from "Cases with RSS Dialogue"	X	X	X	X	X						
DX-577		RQC0113907	RQC0113908		Excerpt from "Cases with RSS Dialogue"	X	X	X	X	X						
DX-578		RQC0113998	RQC0114035		Excerpt from "Cases with RSS Dialogue"	X	X	X	X	X						
DX-579					WITHDRAWN											
DX-580					WITHDRAWN											
DX-581					WITHDRAWN											
DX-582		RQC0114771	RQC0114772		Excerpt from "Cases with RSS Dialogue"	X	X	X	X	X						
DX-583		RQC0115382	RQC0115382		Excerpt from "Cases with RSS Dialogue"	X	X	X	X	X						
DX-584		RQC0116773	RQC0116774		Excerpt from "Cases with RSS Dialogue"	X	X	X	X	X						
DX-587		RQC0355362	RQC0355362	5/27/2011	Email from S. Hanson to TEAM-Scott Hanson, TEAM-Mark Deustch, and TEAM-Joey Alcazar re: Installation/patching of RSS		X	X	X							
DX-588		RQC0017353	RQC0017354	5/27/2011	Email from B. Offenbacher to S. Hanson and M. Roisum RE: Greenville RSS Install		X	X	X							

PLAINTIFF ePLUS INC.'S SPECIFIC OBJECTIONS TO DEFENDANT LAWSON SOFTWARE, INC.'S LIST OF AFFIRMATIVE CONTEMPT HEARING EXHIBITS

Def. No.	Plt. No.	Begin Bates	End Bates	Date	Exhibit Description	106	401/402	403	801/802/ 805	901	1006	FRCP 26	MIL	NR	INACC	NOT EVIDENCE
DX-589		RQC2296568	RQC2296570	5/28/2011	Email from C. Bennett to S. Merten re: Team call notes and CRITICAL UPDATE – PLEASE REVIEW ASAP				X							
DX-592					WITHDRAWN											
DX-595					WITHDRAWN											
DX-596					WITHDRAWN											
DX-597		RQC2656377	RQC2656380	6/22/2011	Email from T. Olson-Stepp to D. Hager FW: RQC SWAT status – June 20 2011		X	X	X							
DX-598					WITHDRAWN											
DX-599					WITHDRAWN											
DX-600					WITHDRAWN											
DX-601					WITHDRAWN											
DX-602					WITHDRAWN											
DX-603					WITHDRAWN											
DX-604					WITHDRAWN											
DX-611					WITHDRAWN											
DX-612					WITHDRAWN											
DX-613					WITHDRAWN											
DX-614					WITHDRAWN											
DX-615					WITHDRAWN											
DX-616					WITHDRAWN											
DX-617					WITHDRAWN											
DX-618					WITHDRAWN											
DX-619		RQC2076803	RQC2076803	Undated	"RSS Injunction Plan" Excel spreadsheet		X	X	X	X						
DX-620					WITHDRAWN											
DX-621		RQC2253556	RQC2253557	6/6/2011	Email from K. Lohkamp to G. Benton RE: Call notes – Version Dependencies for RQC		X	X	X							
DX-622		RQC2120905_1	RQC2120905_33	6/7/2011	"Lawson Requisition Center Field Enablement" presentation		X	X	X							
DX-625	PX-1011	RQC0000695	RQC0000708	5/1/2011	Lawson Requisition Center Overview											Stipulated Exhibit
DX-627					WITHDRAWN											
DX-629		RQC0860711			Spreadsheet detailing hours spent on RQC		X		X	X	X	X	X			
DX-630		RQC0849279			Spreadsheet detailing hours spent on RQC				X		X		X	X		
DX-632		EPLUSPT000315	EPLUSPT000316	6/1/2011	Email from Kley Parkhurst to Ken Farber et al. FW: Lawson Injunction.....		X	X	X							
DX-633		EPLUSPT000319	EPLUSPT000320	6/3/2011	Email from Ken Farber to raosu@trinity-health.org. FW: Lawson Injunction.....		X	X	X							
DX-634					WITHDRAWN											
DX-635					WITHDRAWN											
DX-636					WITHDRAWN											
DX-637					WITHDRAWN											
DX-638					WITHDRAWN											
DX-639					WITHDRAWN											
DX-640					WITHDRAWN											
DX-641					WITHDRAWN											
DX-642					WITHDRAWN											
DX-645					WITHDRAWN											
DX-646					WITHDRAWN											
DX-647					WITHDRAWN											
DX-648					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 4: Effects of isolated corrections to Dr. Ugone's calculations		X		X		X				X	
DX-649					WITHDRAWN											
DX-650					WITHDRAWN											
DX-651					WITHDRAWN											
DX-652					WITHDRAWN											

PLAINTIFF ePLUS INC.'S SPECIFIC OBJECTIONS TO DEFENDANT LAWSON SOFTWARE, INC.'S LIST OF AFFIRMATIVE CONTEMPT HEARING EXHIBITS

Def. No.	Pt. No.	Begin Bates	End Bates	Date	Exhibit Description	106	401/402	403	801/802/ 805	901	1006	FRCP 26	MIL	NR	INACC	NOT EVIDENCE
DX-653					WITHDRAWN											
DX-654					WITHDRAWN											
DX-655					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 7: ePlus income statement (FY Q3:2011 – Q2:2012)		X		X		X				X	
DX-656					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 8: Lawson income statement: Americas region (FY 2011)		X		X		X				X	
DX-657					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 8, Schedule A: Lawson income statement: Americas region (FY 2011): profit margins for license, maintenance, and service revenues		X		X		X				X	
DX-658					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 8, Schedule B: Regression results to determine Lawson's incremental margin		X		X		X				X	
DX-659					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 8, Schedule C: Lawson incremental profit		X		X		X				X	
DX-660					WITHDRAWN											
DX-661					WITHDRAWN											
DX-662					WITHDRAWN											
DX-663					WITHDRAWN											
DX-664					WITHDRAWN											
DX-665					WITHDRAWN											
DX-666					WITHDRAWN											
DX-667					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 12: Summary of RSS/RQC customers		X		X		X				X	
DX-668					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 12, Schedule A: List of customers in prohibited configurations		X		X		X				X	
DX-669					WITHDRAWN											
DX-670					WITHDRAWN											
DX-671					WITHDRAWN											
DX-672					WITHDRAWN											
DX-673					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Figure 5: Lawson quarterly sales and marketing expenses vs. revenues vs (2000-2011)		X		X		X				X	
DX-674					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Figure 6: Quarterly % changes in Lawson revenues vs. sales & marketing expenses 2000 -2011		X		X		X				X	
DX-675					WITHDRAWN											
DX-676					WITHDRAWN											
DX-677					WITHDRAWN											
DX-678		L0305236	L0305319	8/21/2007	Lawson Software Customer Agreement with Heartland Regional Medical Center	X	X		X							
DX-679		ePLUS0949075	ePLUS0949075	4/26/2010	Income Statement – ePlus Systems		X	X								
DX-680					ePlus 10-K Forms (2009-2011)		X	X					X			
DX-682					ePlus, Inc. Statement of Profit and Loss Fiscal Years ending March 31		X	X					X			
DX-685					WITHDRAWN											
DX-686					Lawson Financial Data 2000-2011 downloaded from Thomson Financial		X		X			X		X		
DX-687					WITHDRAWN											
DX-688		RQC1002864	RQC1002866	9/1/2011	Draft email from Keith Lohkamp to Will Schultz RE: URGENT ePlus – Declarations from customers		X		X							

PLAINTIFF ePLUS INC.'S SPECIFIC OBJECTIONS TO DEFENDANT LAWSON SOFTWARE, INC.'S LIST OF AFFIRMATIVE CONTEMPT HEARING EXHIBITS

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DX-689		RQC1003054	RQC1003055	6/27/2011	Email from Dale Christopherson to Will Schultz RE: # of total hours to transition to RQC		X									
DX-692		RQC0859381		6/3/2011	Meeting request from Bruce McPheeters Re: Urgent call at 4 pm Central today to decide about additional punchout change		X		X							
DX-697		RQC2139806	RQC2139821	6/10/2011	Letter from Dan McDonald to Scott Robertson Re: ePlus Inc. v. Lawson Software, Inc.		X		X							X
DX-699		RQC1001536		2/17/2011	Email from Dan McDonald RE: Urgent: Your help needed with battle plan against ePlus	X			X							
DX-700		RQC0919780_00001		3/11/2011	Email from John Mulchrone Re: ePlus- Quick Update				X							
DX-702		RQC0915215_00001	RQC0915215_00002	4/12/2011	Email from Dale Christopherson to John Mulchrone FW: ePlus – proposed behavior for RSS and Punchout		X		X							
DX-703					WITHDRAWN											
DX-704		RQC0868692_00001	RQC0868692_00002	2/9/2011	Meeting Invite Re: Canceled: Urgent: Your help needed with battle plan against ePlus	X	X		X							
DX-705		RQC0868732_00001	RQC0868732_00004	2/9/2011	Attachment to DC-710 "S-3 RSS/Punchout and M3 Battle Plan Against ePlus				X							
DX-706		RQC0915301	RQC0915301_00010	3/14/2011	Email from Dale Christopherson attaching "2011 03 11 Mitigation Strategiesv2 (2).pptx"				X							
DX-708		RQC3005746	RQC3005747	6/7/2011	Email from Bruce McPheeters to Keith Lohkamp RE: Need Guidance on Patch											Duplicate of DX-737
DX-709		RQC0860636	RQC0860639	6/28/2011	Jira ticket Case 132676 Summary		X									
DX-714					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 1: Curriculum Vitae of Jonathan D. Putnam, Ph.D.		X									X
DX-715					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 2: List of Documents Considered		X									X
DX-716					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 2: List of Documents Considered		X									X
DX-717					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 3: Comparison of Damages Calculation.		X									X
DX-718					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 4: Apportionment of Lawson accused revenues		X									X
DX-719					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 5: Summary of Lawson Accused Revenues		X									X
DX-720					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 6: Summary of Lawson Accused License and Maintenance Revenues		X									X
DX-721					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 7: Calculation of Accused Service Revenues		X									X
DX-722					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 7H: Calculation of Accused License/Maintenance for Healthcare Customers		X									X
DX-723					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 6H: Calculation of Accused Service Revenues for Healthcare Customers		X									X
DX-724					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 8: Calculation of Apportionment Factors		X									X
DX-725					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 9: Lawson Income Statement		X									X

PLAINTIFF ePLUS INC.'S SPECIFIC OBJECTIONS TO DEFENDANT LAWSON SOFTWARE, INC.'S LIST OF AFFIRMATIVE CONTEMPT HEARING EXHIBITS

Def. No.	Plt. No.	Begin Bates	End Bates	Date	Exhibit Description	106	401/402	403	801/802/ 805	901	1006	FRCP 26	MIL	NR	INACC	NOT EVIDENCE
DX-726					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 10: Lawson Income Statement: Americas Region, Profit Margins		X									X
DX-727					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 11: Regression Results to Determine Lawson's Incremental Margin		X									X
DX-728					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 12: Calculation of Lawson's Incremental Profit		X									X
DX-729					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 13: Summary of Lawson Customers with Prohibited Configurations		X									X
DX-730					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 14: Customers Without All Infringing SKUs		X									X
DX-731		L0165553	L0165579	5/26/1993	Lawson Software Customer Agreement with Cash America International, Inc.		X		X							
DX-732		L0217627	L0217630	5/30/2002	Lawson Software Customer Agreement with Legacy Health System		X		X							
DX-733	PX-0280	LE00206653	LE00206992	3/22/2005	Presbyterian Healthcare Services ERP System Request for Proposal		X		X							
DX-736	PX-1250	RQC3000243	RQC3000244	6/3/2011	Email string from D. Christopherson to J. Mulchrone and B. Crawford FW: Changes RSS to RQC											
DX-738		RQC1003001	RQC1003001	5/23/2011	(Und. Direct Ex. 1) Email from D. Hager to J. Catalino, B. Murphy and D. Siebert re RSS deals this quarter					X						
DX-739		ePLUS0229503	ePLUS0229572	5/26/2004	ePlus v. Ariba Complaint dated May 26, 2004		X	X	X							X
DX-740		ePLUS0232981	ePLUS0233069	4/18/2005	ePlus v. SAP Complaint dated April 18, 2005		X	X	X							X
DX-741		ePLUS0430972	ePLUS0431032	6/17/2002	Master Software License Agreement between ePlus and Gannett	X	X	X								
DX-742				5/18/2010	Plaintiff's Second Supplemental Answers to Lawson's Second Set of Interrogatories dated 05/18/10	X	X									
DX-743				5/18/2010	Plaintiff's Second Supplemental Answers to Lawson's Fourth Set of Interrogatories dated 05/18/10	X	X									
DX-744				2/7/2011	ePlus's Rule 26 Supplemental Disclosure Concerning Injunctive Relief	X	X									
DX-745				2/10/2011	Office Action mailed February 10, 2011 in U.S. Application No. 90/011,066 ('683 Patent, claims 1-25)	X	X	X					X			
DX-746					ePlus Rebuttal Disclosure Concerning Injunctive Relief	X	X									X
DX-747					WITHDRAWN											
DX-748	PX-0043	ePLUS0524597	ePLUS0524622	2/12/2005	Settlement & License Agreement between Ariba, Inc. and ePLUS, Inc., dated February 12, 2005		X	X						X		
DX-749	PX-0317	ePLUS0940765	ePLUS0940776	8/28/2009	Settlement and License Agreement between ePLUS Inc. and Perfect Commerce, LLC and Exhibits A and B		X	X						X		
DX-750	PX-0318	ePLUS0940777	ePLUS0940801	12/11/2006	Patent License and Settlement Agreement among SAP America, Inc., SAP AG and ePLUS inc.		X	X						X		
DX-751	PX-0319	ePLUS0940802	ePLUS0940814	8/19/2009	Settlement and License Agreement between ePLUS, Inc. and SciQuest, Inc. and Exhibits A and B		X	X						X		
DX-752	PX-0320	ePLUS0940815	ePLUS0940835	7/7/2009	Settlement and License Agreement between ePLUS inc. and Verian Technologies, Inc. and Exhibits A and B		X	X						X		
DX-753				3/25/2011	Transcript of Evidentiary Hearing regarding Motion for Permanent Injunction	X	X	X	X							X
DX-754				5/18/2011	Decision of the Board of Patent Appeals and Interferences	X	X	X						X		
DX-755				3/23/2012	Decision of the Board of Patent Appeals and Interferences	X	X	X						X		
DX-756				6/20/1905	2013.02.20 Deposition of K. Ugone – Exhibit 3—“Ugone et al., Preparing the Financial Expert or Economist” article		X									

PLAINTIFF ePLUS INC.'S SPECIFIC OBJECTIONS TO DEFENDANT LAWSON SOFTWARE, INC.'S LIST OF AFFIRMATIVE CONTEMPT HEARING EXHIBITS

Def. No.	Plt. No.	Begin Bates	End Bates	Date	Exhibit Description	106	401/402	403	801/802/ 805	901	1006	FRCP 26	MIL	NR	INACC	NOT EVIDENCE
DX-757					2013.02.20 Deposition of K. Ugone – Exhibit 4—“Accounting for Damages in Intellectual Property Litigation”		X									
DX-758				9/4/2009	2013.02.20 Deposition of K. Ugone – Exhibit 5—Order, Tivo Inc. v. Dish Network Corp et al., C.A. 2:04-cv-01 (DF)		X									X

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**DEFENDANT LAWSON SOFTWARE, INC.'S OBJECTIONS TO PLAINTIFF ePLUS INC.'S LIST OF AFFIRMATIVE
CONTEMPT HEARING EXHIBITS**

Exhibit No.	Begin Bates	End Bates	Date	Exhibit Description	Lawson's Objections
PX-1001	RQC0000047	RQC0000347	June 2011	2011.12.19 Deposition of Dale Christopherson - Exhibit 06 - Inventory Control User Guide Version 9.0.1	401/402
PX-1006	RQC0364605	RQC0364612	February 10, 2011	2011.12.19 Deposition of Dale Christopherson - Exhibit 13 - Email from K. Kunth to D. Christopherson, T. Dooner et al. RE: Analysis of claims from eplus	401/402; 701; 801/802
PX-1007	N/A	N/A		2011.12.19 Deposition of Dale Christopherson - Exhibit 15 & 2012.02.02 Deposition of Benjamin Goldberg - Exhibit 07 - Weaver Declaration in Support of Motion to Show Cause Exhibit 2 – RQC Interface	401/402
PX-1008	N/A	N/A		2011.12.19 Deposition of Dale Christopherson - Exhibit 16 & 2012.02.02 Deposition of Benjamin Goldberg - Exhibit 08 - Weaver Declaration in Support of Motion to Show Cause Exhibit 3 – RSS Interface	401/402
PX-1010	RQC0000656	RQC0000690	June 3, 2011	2011.12.19 Deposition of Dale Christopherson - Exhibit 18 & 2012.01.06 Deposition of Dean Hager - Exhibit 20 - I - Presentation: Introducing Lawson Requisition Center	403

Exhibit No.	Begin Bates	End Bates	Date	Exhibit Description	Lawson's Objections
PX-1016	RQC2115799	RQC2115832	March 30, 2011	2011.12.19 Deposition of Dale Christopherson - Exhibit 24 & 2011.12.21 Deposition of Todd Dooner - Exhibit 104 - Presentation: ePlus Risk Mitigation Planning	401/402
PX-1018	RQC0822226	RQC0822227	March 18, 2011	2011.12.20 Deposition of Dale Christopherson - Exhibit 26 - Email from D. Christopherson to K. Lohkamp RE: GoToMeeting Invitation – SciQuest and Lawson, Healthcare Solutions Demonstrations	401/402
PX-1023	RQC0921818	RQC0921819	March 30, 2011	2011.12.20 Deposition of Dale Christopherson - Exhibit 31 - Email from J. Catalino to I. Svensson RE: proposed language for sales on ePlus	801/802
PX-1027	RQC0239879	RQC0239880	August 2, 2011	2011.12.20 Deposition of Dale Christopherson - Exhibit 37 - Email from M. Klebe to A. Drury RE: Hi Aaron!	401/402; 801/802
PX-1029	RQC0004233	RQC0004233	May 25, 2011	2011.12.20 Deposition of Dale Christopherson - Exhibit 39 - Email from M. Bragstad to N. Anderson et al. RE: Changes being brought with Req Center	403
PX-1031	RQC0008371	RQC0008371	May 25, 2011	2011.12.20 Deposition of Dale Christopherson - Exhibit 41 - Email from D. Christopherson to M. Bragstad et al. RE: Changes being brought with Req Center	403
PX-1032	RQC0122080	RQC0122080	June 02, 2011	2011.12.20 Deposition of Dale Christopherson - Exhibit 42 - Email from M. Bragstad to E. Homewood RE: Changes being brought with Req Center	403

Exhibit No.	Begin Bates	End Bates	Date	Exhibit Description	Lawson's Objections
PX-1034	RQC0369859	RQC0369860	June 8, 2011	2011.12.21 Deposition of Elizabeth Homewood - Exhibit 05 & 2011.12.29 Deposition of Scott Hanson - Exhibit 12 - Email from G. Benton to D. Davidson Re RQC	801/802
PX-1040	RQC0764098	RQC0764098	June 29, 2011	2011.12.21 Deposition of Elizabeth Homewood - Exhibit 11 - Email from D. Orndorff to R. Ainsbury, RE: ePlus - updated Master list of customers	801/802
PX-1044	RQC0538393	RQC0538394	June 23, 2011	2011.12.21 Deposition of Elizabeth Homewood - Exhibit 17 - Email from M. Bragstad to E. Homewood RE: Conversation with Matthew Bragstad	801/802
PX-1063	RQC0635983	RQC0635984	June 24, 2011	2011.12.29 Deposition of Scott Hanson - Exhibit 14 - Email from R. Graham to S. Hanson RE: RSS to RQC Services Reserve Calculation	401/402
PX-1064	RQC0022539	RQC0022539	June 1, 2011	2011.12.29 Deposition of Scott Hanson - Exhibit 15 - Email from S. Hanson to S. Abrams, S. Irani and G. Cardwell RE: RQC	401/402
PX-1067	RQC0019874	RQC0019877	September 15, 2011	2011.12.29 Deposition of Scott Hanson - Exhibit 18 - Email from S. Hanson to D. Utteridge RE: RQC at Nuffield	401/402
PX-1071	RQC2115683	RQC2115686	June 2, 2011	2011.12.29 Deposition of Scott Hanson - Exhibit 22 - Email from M. Salovich to P. Schultz and G. Barchan FW: RQC Training: is is "required" for "existing" customers?	401/402; 801/802
PX-1075	N/A	N/A		2012.01.05 Deposition of Kevin Samuelson - Exhibit 05 - Lawson License Revenues, January 2011- November 2011	401/402

Exhibit No.	Begin Bates	End Bates	Date	Exhibit Description	Lawson's Objections
PX-1076	N/A	N/A		2012.01.05 Deposition of Kevin Samuelson - Exhibit 06 - Lawson Maintenance Revenues, January 24, 2011 - November 30, 2011	401/402
PX-1089	RQC2631716	RQC2631750	April 12, 2011	2012.01.06 Deposition of Dean Hager - Exhibit 05 - Email from M. Braun to P. Schultz and G. Barchan Re Requisition Center Launch – Difference ppt Attachment: ePlus: Risk Mitigation Planning Presentation, dated March 30, 2011	401/402; 403
PX-1092	RQC2300898	RQC2300900	March 30, 2011	2012.01.06 Deposition of Dean Hager - Exhibit 08 - Email from K. Madson to J. Ekelin RE: proposed language for sales plus	401/402; 801/802 *
PX-1093	RQC0883671	RQC0883673	April 26, 2011	2012.01.06 Deposition of Dean Hager - Exhibit 09 - Email from D. Christopherson to T. Dooner and D. Hicarte FW: Scenario Grid	401/402
PX-1094	RQC2631677	RQC2631679	May 4, 2011	2012.01.06 Deposition of Dean Hager - Exhibit 10 - Email from M. Braun to D. Hager and J. Langer RE: DEAN – can you review and approve for RSS next steps?	401/402; 801/802
PX-1095	RQC0917250	RQC0917256	May 10, 2011	2012.01.06 Deposition of Dean Hager - Exhibit 11 - Email from K. Lohkamp to K. Madson. J. Langer and M. Braun RE: rev rec comments	401/402
PX-1097	RQC2714497	RQC2714501	May 27, 2011	2012.01.06 Deposition of Dean Hager - Exhibit 13 - Email from I. Svensson to C. Gustafson RE: ACTION the 277 – next step	401/402; 801/802/805 *

Exhibit No.	Begin Bates	End Bates	Date	Exhibit Description	Lawson's Objections
PX-1099	RQC0764901	RQC0764903	May 24, 2011	2012.01.06 Deposition of Dean Hager - Exhibit 15 - Email from T. Blake to J. Langer RE: e-plus litigation	401/402; 801/802
PX-1103	RQC0869344	RQC0869345	May 26, 2011	2012.01.06 Deposition of Dean Hager - Exhibit 19 - Email from S. Melsa to N. Anderson FW: draft customer letter regarding e-plus	401/402; 801/802
PX-1106	RQC0186340	RQC0186343	June 7, 2011	2012.01.06 Deposition of Dean Hager - Exhibit 23 - Email from D. Christopherson to K. Lohkamp, S. Hanson and N. Anderson RE: RQC bug count	401/402; 801/802/805
PX-1107	RQC0055076	RQC0055076	May 25, 2011	2012.01.06 Deposition of Dean Hager - Exhibit 24 - Email from J. Hogan to D. Hager and C. Balmforth FW: Changes being brought with Req Center	403
PX-1109	RQC0839509	RQC0839510	March 29, 2011	2012.01.06 Deposition of Dean Hager - Exhibit 26 - Email from J. Langer to D. Snyder RE: ePlus Litigation – URGENT ACTION for you	401/402
PX-1110	RQC0922437	RQC0922440	May 5, 2011	2012.01.06 Deposition of Dean Hager - Exhibit 27 - Email from D. Hager to J. Langer RE: YOUR COMMENTS REQUESTED: Preview of AE and RSM email on Requisitions Self-Service	401/402
PX-1116	RQC2300171		May 18, 2011	2012.01.06 Deposition of Keith Lohkamp - Exhibit 14 - Email from D. Christopherson to D. Kempker, J. Langer et al. RE: Recommendation on next steps for RSS and RQC	*

Exhibit No.	Begin Bates	End Bates	Date	Exhibit Description	Lawson's Objections
PX-1118	RQC2657684	RQC2657686	September 6, 2011	2012.01.06 Deposition of Keith Lohkamp - Exhibit 16 - Email from D. Hager to K. Lohkamp, RE: update on RQC/ePlus Communications	403
PX-1120	RQC0023552	RQC0023554	September 15, 2011	2012.01.06 Deposition of Keith Lohkamp - Exhibit 18 - Email from K. Reasoner to K. Lohkamp FW: Estimated RQC Implementation Costs dated September 15, 2011 and undated attachment, RQC Implementation	401/402
PX-1121	RQC0023547	RQC0023548	September 16, 2011	2012.01.06 Deposition of Keith Lohkamp - Exhibit 19 - Email from Dan Azevedo to Kurt Reasoner and Keith Lohkamp RE: RSS Replacement Cost Estimate, dated September 16, 2011	401/402
PX-1122	RQC2131310	RQC2131312	September 16, 2011	2012.01.06 Deposition of Keith Lohkamp - Exhibit 20 - E-mail from K. Lohkamp to J. Ekelin FW: RSS Replacement Cost Estimate dated September 16, 2011 and undated attachment, RSS Replacement Application Implementation	401/402
PX-1123	RQC0026129	RQC0026129	June 2, 2011	2012.01.06 Deposition of Keith Lohkamp - Exhibit 22 - Email from K. Lohkamp to B. Ciacrochi RE: REQ Center	401/402
PX-1124	RQC2214590	RQC2214591	May 31, 2011	2012.01.06 Deposition of Keith Lohkamp - Exhibit 23 - E-mail from M. Klebe to M. Finckler RE: RQC-BETA Customers/ Live Customers?	401/402; 801/802
PX-1125	RQC0838864.0001	RQC0838864.0002		2012.01.06 Deposition of Keith Lohkamp - Exhibit 24 - Spreadsheet – S3HCM (Excerpt)	801/802

Exhibit No.	Begin Bates	End Bates	Date	Exhibit Description	Lawson's Objections
PX-1126	N/A	N/A	January 31, 2012	2012.02.02 Deposition of Benjamin Goldberg - Exhibit 10 - Webpage: Supplier Resource Library, accessed 1/31/12 < https://sciquest.com/SupplierResourceLibrary/?page_id=1104 >	401/402; 801/802
PX-1134	EPLUSPT000395	EPLUSPT000395	December 5, 2011	2012.01.13 Initial Expert Report of Alfred C. Weaver, Ph.D. Concerning Defendant's Contempt of the Court's Permanent Injunction - Exhibit 06 - RQC Demonstration - RQC Punchout, Claim 26 of '683 Patent	401/402; 601; 801/802 (no objection if used as a demonstrative exhibit).
PX-1135	EPLUSPT000396	EPLUSPT000396	November 15, 2011	RQC demonstration re Item Master requisitioning	401/402
PX-1179	RQC0010819	RQC0010820	March 18, 2011	Email from D. Christopherson to D. DeLancey and D. Christianson FW: GoToMeeting Invitation - SciQuest and Lawson. Healthcare Solution Demonstrations	401/402
PX-1182	RQC0021435	RQC0021438	July 7, 2011	Email from S. Hanson to S. Varma RE: Question about existing Reqs in RSS *Created CASE #136641 by AD,	401/402
PX-1187	RQC0055895	RQC0055895	June 24, 2011	Email from S. Merten to T. Olson-Stepp and S. Hanson RE: RSS to RQC Services Reserve Calculation	401/402/403
PX-1193	RQC0109478	RQC0109766	February 22, 2011	Lawson Response to Request for Proposal (RFP) # 00000154 City of Alexandria, VA for Enterprise Resource Planning (ERP) Software and Implementation Services	401/402
PX-1194	RQC0111339	RQC111356		Lawson Customer List	401/402
PX-1199	RQC0251549	RQC0251550	May 25, 2011	Email from M. Klebe to D. O'Connor RE: Help View Case 112425	801/802

Exhibit No.	Begin Bates	End Bates	Date	Exhibit Description	Lawson's Objections
PX-1204	RQC0824948	RQC0824951	June 8, 2011	Email from J. Goldman to K. Lohkamp RE: NEW INFORMATION: Lawson Requisition Center	401/402; 801/802/805
PX-1211	RQC0920379.001	RQC0920379.069		Spreadsheet of Q's and A's from RQC Webinar	401/402
PX-1213	RQC2035292	RQC2035293		Investor Talking Points re: ePlus Matter	401/402; 801/802
PX-1214	RQC2115683	RQC2115686	June 2, 2011	Email from M. Salovich to P. Schultz and G. Barcham RE: FW: RQC Training: is it "required" for "existing" customers?	401/402; 403; 801/802
PX-1217	RQC2273796	RQC2273796	May 26, 2011	Email from B. Fridell to D. Hager et al. RE: Lawson's response to Summa's concerns	401/402
PX-1218	RQC2297215	RQC2297217	April 26, 2011	Email from G. Leduc to A. Price, D. Davidson, and C. Bennett RE: Requisition Center ePlus	401/402*
PX-1220	RQC2348362	RQC2348363	May 26, 2011	Email from B. Slaney to M. Evans, J. Goldman et al. RE: FW: RQC Customer Objections to Address	401/402; 801/802
PX-1222	RQC2466739	RQC2466739	May 30, 2011	Email from I. Kim to S. Tolchin, R. Innocentin et al. RE: ePlus Talking Points	401/402; 801/802
PX-1223	RQC2466740	RQC2466740	May 30, 2011	Investor Talking Points re: ePlus Matter	401/402; 801/802
PX-1225	RQC2578709	RQC2578712	June 2, 2011	Email from V. Borowik to C. Bennett RE: ** Please review this final ** - Lawson Learning RQC Course Options	401/402; 801/802
PX-1226	RQC2676828	RQC2676830	June 6, 2011	Email from L. Iozzo to M. Pebesma RE: RSS Options	401/402; 801/802
PX-1227	RQC2741647	RQC2741735	April 2011	RSS and RQC QA Test Results	801/802
PX-1228	N/A	N/A	August 22, 2011	Demonstration of RQC	401/402; 801/802; 602 (no objection to use as demonstrative exhibit).
PX-1229	RQC0922314	RQC0922318	May 27, 2011	Email from D. Hager to J. Catlino and B. McPheeters re Action: the 277 - Next Step	401/402; 801/802*

Exhibit No.	Begin Bates	End Bates	Date	Exhibit Description	Lawson's Objections
PX-1230	RQC0922460_00001	RQC0922460_00001	March 25, 2011	Email from D. Hager to H. Debes re ePlus Notes with attachment "ePlus by the Numbers"	401/402/403*
PX-1231	RQC1000192	RQC1000195	May 26, 2011	Email from D. Christopherson to M. Cohen re Punchout	401/402*
PX-1232	RQC1001919	RQC1001924	July 20, 2011	Email from E. Homewood to S. Connors, M. Anderson, and H. Raleigh re Client 6552 - (American Hospital Dubai) Mohamed & Obaid Almulla LLC - No Access to RSS Download	401/402*
PX-1233	RQC1002444	RQC1002450	April 3, 2011	Email from J. Langer to B. Murphy, J. Catalino, and D. Siebert re ePlus - CUE Messaging and Scenarios for Executive Management	401/402; 801/802*
PX-1234	RQC1003017	RQC1003019	September 19, 2011	Email from D. Christopherson to W. Schultz and T. Dooner re Information Request	*
PX-1235	RQC1003184	RQC1003185	June 7, 2011	Email from J. Langer to B. McPheeters, K. Lohkamp and M. Cohen re Need Guidance on Patch	*
PX-1236	RQC1003200	RQC1003202	May 18, 2011	Email from J. Ekelin to D. Christopherson, D. Kempker, J. Langer, D. Snyder, K. Lohkamp, and M. Braun re Reccomendation on Next Steps for RSS and RQC	401/402/403*
PX-1237	RQC2297222	RQC2297226	May 6, 2011	Email from G. Leduc to J. Schulman re Requisition Center ePlus	401/402; 801/802*
PX-1238	RQC2304315	RQC2304316	June 16, 2011	Email from N. Anderson to M. Tincher, K. Lohkamp, and D. Kempker re Decommission Notice	401/402*

Exhibit No.	Begin Bates	End Bates	Date	Exhibit Description	Lawson's Objections
PX-1239	RQC2714578	RQC2714581	September 23, 2011	Email from M. Anderson to S. Rauf re Client ID - 5321, Case ID 154096	401/402; 801/802*
PX-1240	RQC2716217	RQC2716219	April 15, 2011	Email from M. Packer to B. McPheeers re Updated Commitment Papers	401/402; 801/802*
PX-1250	RQC3000243	RQC3000244	June 3, 2011	Email from D. Christopherson to J. Mulchrone and B. Crawford re Changes RSS to RQC	*
PX-1251	RQC3000370	RQC3000370	April 22, 2011	Email from M. Cohen to D. Hager and B. McPheeers re Requisition Center	401/402/403*
PX-1252	RQC3000374	RQC3000374	April 13, 2011	Email from M. Cohen to B. McPheeers and J. Ekelin re ePlus	401/402/403*
PX-1253	RQC3002497	RQC3002498 and RQC1002446 - 50 (attach)	April 1, 2011	Email from J. Ekelin to J. Langer, B. McPheeers, T. Blake, M. Cohen, D. Hager, and J. Comport re ePlus - CUE Messaging and Scenarios for Executive Management	401/402/403*
PX-1254	RQC3002676	RQC3002677 (with attach)	June 9, 2011	Email from J. Ekelin to D. Christopherson, E. Homewood, M. Cohen, S. Merten, K. Lohkamp, and J. Langer re Q&A from Friday Webinar - Latest Version	*
PX-1255	RQC3002775	RQC3002778	June 7, 2011	Email from D. Christopherson to D. Hager, B. McPheeers, K. Lohkamp, J. Langer, M. Cohen and J. Mulchrone re Need Decision and Input on New Requested Change to RQC Related to Procurement Punchout	*
PX-1256	RQC3002882	RQC3002884	May 26, 2011	Email from D. Christopherson to M. Cohen Re Punchout	401/402*
PX-1257	RQC3002990	RQC3002990	April 5, 2011	Email from D. Christopherson to M. Cohen re ePlus	401/402*
PX-1258	RQC3003518	RQC3003520	March 11, 2011	Email from D. McDonald to B. McPheeers re ePlus Case Update	401/402; 801/802*

Exhibit No.	Begin Bates	End Bates	Date	Exhibit Description	Lawson's Objections
PX-1259	RQC3003530	RQC3003530	March 7, 2011	Email from D. Christopherson to B. McPheeters re Response to your Voice Mail	401/402*
PX-1260	RQC3004306	RQC3004310	April 1, 2011	Memo from Lawson Legal Department to Executive Management re CUE Messaging for ePlus Patent Infringement Case	401/402; 801/802*
PX-1261	RQC3005817	RQC3005820	April 13, 2011	Email from B. McPheeters to M. Cohen re Lawson Healthcare Weekly Pulse: Week Ending April 8, 2011	401/402; 801/802*
PX-1262	N/A	N/A	1/27/2011 - 11/30/2012	Federal Rule of Evidence 1006 summaries of Lawson financial information	401/402; 801/802; 602; 901; 106; 1002
PX-1263	RQC3004438	RQC3004439	April 11, 2011	Email from B. McPheeters to J. Langer, K. Lohkamp, M. Braun, J. Mulchrone, D. Christopherson, K. White, B. Doyle, H. Pribyl, G. Tolkmit, S. Schulz, and B. Loch Re: confidential discussion draft of press release re ePlus injunction	401/402*
PX-1264	RQC2714421	RQC2714421	March 31, 2011	Email from J. Langer to T. Blake Re: ePlus messaging	401/402*
PX-1265	RQC1001739	RQC1001745	June 20, 2011	Email from J. Langer to D. Snyder Re: ePlus - follow up re customer counts and maintenance revenues at risk	401/402*
PX-1266	RQC0893665_00001	RQC0893665_00002	May 27, 2011	Email from D. Hager to K. White Re: Lawson's response to Summa's concerns	401/402; 801/802; 602*
PX-1271	N/A	N/A	December 22, 2011	2011.12.22 Defendant Lawson Software, Inc.'s Supplemental Responses to Plaintiff ePlus Inc.'s First Set of Interrogatories for Contempt Proceedings (Interrogatories 11-12)	401/402

* = Lawson maintains its privilege objection to the indicated document which was produced by Lawson pursuant to Court Order and over Lawson's assertion of privilege.

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Please note that pursuant to the Court's order on March 12, 2013 (Docket No. 1018), ePlus is taking testimony of Mr. Dean J. Hager on March 20, 2013. As a result, the following deposition designations for Mr. Hager may be supplemented.

DEPOSITION OF DEAN J. HAGER (January 6, 2012)

ePlus Affirmative Designation	Lawson Fairness Designations/ Summaries	ePlus Objections to Lawson Fairness Designations	ePlus Objections to Lawson Fairness Summaries
9:11 - 9:22	11:3-18, 16:18-17:11 (context for whole deposition)	401/402/403 (confusion of the issues)	Incomplete summary; Mischaracterizes testimony; parts of testimony relate to whether Mr. Hager was being compensated for testimony
12:6 - 12:12			
14:9 - 14:15			
17:21 - 18:8			
20:5 - 20:11			
20:17 - 20:22			
21:3 - 21:7			
22:14 - 22:20			
25:20 - 26:4	26:5 (objection)	LR 30(F)	
26:6 - 26:10			
26:22 - 27:3	27:4-5 (objection)	LR 30(F)	
27:6 - 27:16	27:17-18 (objection)	LR 30(F)	
27:19 - 28:1	28:2-5 (objection)	LR 30(F)	
28:14 - 28:16	28:17-28:22; 29:2-3 (context for discussion)	401/402; 403	Incomplete summary; Witness admits that he was involved in preparation of letter and with drafts of letter
29:19 - 29:22	30:1 (objection)	LR 30(F)	
30:3 - 30:17	30:18 (objection)	LR 30(F)	
31:1 - 31:9	31:10-11; 31:13-14 (context of answer)		
31:15 - 32:1			
33:12 - 33:18			
34:4 - 34:6	34:7 (objection)	LR 30(F)	
34:8 - 34:12			
43:2 - 43:5	43:6 (objection)	LR 30(F)	
43:8 - 43:11	43:12 (objection)	LR 30(F)	
43:13 - 43:15			
44:4 - 44:11	44:12 (objection)	LR 30(F)	
44:13	44:21-45:1, 45:3-11, 45:15-16 (context - all conversations with customers were about the process, not functional changes)		Incomplete summary; Mischaracterizes testimony; witness first gives testimony that "almost all" of conversations with customers were about the process, and later states that he "[does not] recall" having any conversations with customers about the functional changes
45:17 - 45:19	45:20 (objection)	LR 30(F)	
46:1 - 46:7			
46:13 - 47:1			

ePlus Affirmative Designation	Lawson Fairness Designations/ Summaries	ePlus Objections to Lawson Fairness Designations	ePlus Objections to Lawson Fairness Summaries
47:11 - 48:1	48:2-3 (objection)	LR 30(F)	
48:5 - 48:12			
50:22 - 51:1			
51:5 - 51:11			
52:15 - 52:16	52:17 (objection)	LR 30(F)	
52:18 - 53:11			
53:13 - 53:18	53:19-54:7 (giving full context)		
54:19 - 55:15	55:16 (objection)	LR 30(F)	
55:17			
55:22 - 56:8	56:9 (objection)	LR 30(F)	
56:11 - 56:14			
60:2 - 60:22	61:1-2 (objection)	LR 30(F)	
61:3			
61:16 - 64:12	67:12-15 (full answer to question); 357:11-362:7, 362:9-363:11, 363:13-18, 363:21-21, 364:8-365:5, 365:7-367:5, 367:19 (necessary context for discussion of exhibit)	106 (incomplete designations- answer only); 401/402/403; 611 (c)	
67:16 - 68:2	68:3-4 (objection)	LR 30(F)	
68:6 - 69:7	69:8-9 (objection)	LR 30(F)	
69:11			
71:5 - 71:7	71:8-9 (objection)	LR 30(F)	
71:11 - 71:14	71:15 (objection)	LR 30(F)	
71:16 - 71:17	71:18-22, 72:3-6 (full answer to question)		Incomplete summary; Mischaracterizes testimony; designation relates to an entirely new question and answer, does not provide a "full answer to question"
73:15 - 74:2	74:3 (objection)	LR 30(F)	
74:4 - 74:15	74:16-20 (context for answer)		Mischaracterizes testimony; testimony is a separate question and answer, not context for answer
74:21 - 75:1			
75:4 - 75:6			
75:8 - 75:12	75:13-76:1 (fuller context of exhibit being discussed)		
76:2 - 76:7			
77:13 - 78:5			
78:17 - 79:6			
79:20 - 79:21			
80:2 - 80:12			
80:16 - 81:1	81:2 (objection)	LR 30(F)	
81:3 - 81:9	81:10-15 (full context to discussion and objection); 353:5-354:3 (context for discussion of exhibit)	LR 30(F); 401/402/403; 611 (c)	
81:16 - 81:20	81:21 (objection)	LR 30(F)	
81:22			
82:21 - 83:6			

ePlus Affirmative Designation	Lawson Fairness Designations/ Summaries	ePlus Objections to Lawson Fairness Designations	ePlus Objections to Lawson Fairness Summaries
84:20 - 85:3	83:21-84:14, 84:16-19, 85:4-6 (full context to discussion and objection)	LR 30(F); 401/402/403 (confusion of the issues)	Incomplete summary; Mischaracterizes testimony; affirmatively designated testimony clearly establishes witness had no reason to doubt that he had a staff meeting concerning mitigation strategies on or about March 30
85:9 - 86:12	86:16 (objection)	LR 30(F)	
86:15 - 86:20			
91:3 - 91:10	88:12-89:22, 89:2-7, 91:13-15 (full context of question)	106 (incomplete designation-question only); 401/402/403 (confusion of the issues)	Incomplete summary; Mischaracterizes testimony; question assumes third-party alternate solution
91:12	91:11 (objection)	LR 30(F)	
92:10 - 92:15	92:16-17 (objection)	LR 30(F)	
92:18 - 93:1	93:2 (objection)	LR 30(F)	
93:3 - 93:4			
93:6 - 93:9	93:11-15 (objection)	LR 30(F)	
93:16 - 94:3			
97:17 - 97:21	98:9-11 (complete answer to question)		Incomplete summary; Mischaracterizes testimony; fairness designation is a completely new question and answer, not needed to provide a "complete answer to question"
98:19 - 99:15	99:16 (objection)	LR 30(F)	
99:18 - 99:21			
104:3 - 104:8	103:15-104:2 (context for question)		
104:12 - 104:19	104:9-10 (objection); 368:7-20, 369:6-17, 369:19-4, 370:10-12 (necessary context for discussion)	LR 30(F); 611 (c)	Incomplete summary; Mischaracterizes testimony; witness discussing different exhibits
105:5 - 105:8	104:20-105:4 (objection)	LR 30(F)	
105:11 - 105:18	105:9-10 (objection)	LR 30(F)	
105:20 - 106:1	105:19 (objection)	LR 30(F)	
106:6 - 106:19			
110:22 - 111:1			
111:4 - 111:7			
111:11 - 111:18			
112:1 - 112:5			
112:12 - 112:14			
113:14 - 114:19			
115:4 - 115:9			
115:21 - 116:17	116:18 (objection)	LR 30(F)	
116:21 - 117:5			
117:15 - 117:17			
117:19 - 118:22			
119:3 - 119:8	119:1-2 (objection)	LR 30(F)	
119:12 - 120:5	119:9-10 (objection)	LR 30(F)	

<i>ePlus Affirmative Designation</i>	Lawson Fairness Designations/ Summaries	<i>ePlus Objections to Lawson Fairness Designations</i>	<i>ePlus Objections to Lawson Fairness Summaries</i>
120:7 - 120:9	120:6 (objection)	LR 30(F)	
120:11 - 120:14	120:10 (objection)	LR 30(F)	
120:16 - 121:3	120:15 (objection)	LR 30(F)	
121:5	121:4 (objection)	LR 30(F)	
125:7 - 126:2	121:6-8, 121:11 (complete answer and objection)	LR 30(F)	
126:8 - 126:13			
127:9 - 127:11			
128:3 - 128:10			
128:21 - 129:1			
129:5			
129:8 - 129:20	129:21-130:6 (complete context of discussion)		
130:7 - 131:5			
131:9 - 131:19	131:7 (objection)	LR 30(F)	
131:21 - 132:8	131:20 (objection)	LR 30(F)	
132:13 - 132:17	132:9-12 (objection)	LR 30(F)	
133:3 - 133:4	133:5 (objection)	LR 30(F)	
133:6 - 134:4	134:5-6 (objection)	LR 30(F)	
134:7 - 134:11	134:12-16 (complete answer)	401/402; 403 (waste of time)	Incomplete summary; Mischaracterizes testimony; fairness designation is an additional question and answer, not needed to provide a "complete answer"
138:21 - 139:1			
139:4 - 139:6			
139:8 - 139:17	139:18-140:12 (context for exhibit being discussed)		
143:10 - 143:13	143:2-9 (context for question); 143:14 (objection)	LR 30(F)	Incomplete summary; designation does not provide context for following question
143:15 - 144:2	144:3 (objection)	LR 30(F)	
144:5	144:6, 144:8-9 (context for question)		
144:10 - 144:20			
145:21 - 146:5	145:8-11, 145:18-20 (context for question and answer)		
146:11 - 146:13	146:14-16 (objection)	LR 30(F)	
146:17	146:18-19 (objection)	LR 30(F)	
146:20 - 147:5	147:6-11 (full context of discussion)		
147:12 - 147:13	147:14-17 (instruction to witness not to disclose conversations with counsel)	LR 30(F)	
147:18 - 148:2	148:3 (objection)	LR 30(F)	
148:4 - 148:5			
148:8 - 148:17			
149:7 - 149:11			
149:18 - 149:19			
149:22 - 150:3			
150:5 - 150:6	150:7 (objection)	LR 30(F)	

ePlus Affirmative Designation	Lawson Fairness Designations/ Summaries	ePlus Objections to Lawson Fairness Designations	ePlus Objections to Lawson Fairness Summaries
150:8 - 150:9	150:10-13 (fuller context of exhibit being discussed)		
150:14 - 150:18			
150:21 - 151:6			
155:10 - 155:14	155:15 (objection)	LR 30(F)	
155:17 - 156:15	157:3-6, 157:8-16 (context for exhibit and answers relating thereto)		Incomplete summary; designates further question and answers, but not for context of referenced exhibit and discussion
158:11 - 158:22			
159:7 - 159:13	159:14-15 (context for discussion)		
159:16 - 160:11	160:12-21 (context for discussion)		
160:22 - 161:4	162:15-163:4 (context for discussion)		
161:12 - 161:21	164:2-3, 164:7 (complete answer to question)		Incomplete summary; Mischaracterizes testimony; fairness designation is an additional question and answer, not a "complete answer to question"
162:2 - 162:14			
163:10 - 164:1			
164:8 - 164:20			
165:7 - 165:15			
169:19 - 170:5	166:12-20, 167:22-167:22, 168:2-7 (context for exhibit and discussion); 351:11-352:19 (context for discussion of exhibit)	LR 30(F); 401/402/403 (cumulative); 611(c)	
170:8 - 170:10	170:6 (objection)	LR 30(F)	
170:19 - 171:1	170:11-13, 170:17-18 (complete context of discussion)	401/402/403 (cumulative)	
171:10 - 172:4			
172:6 - 172:7			
172:10 - 172:12			
172:20 - 173:7			
173:22 - 175:3	173:13-15 (context for exhibit and discussion)		
175:11 - 175:14			
175:16 - 175:17			
176:5 - 176:22	177:1 (objection)	LR 30(F)	
177:10 - 177:11			
178:22 - 180:5			
182:9 - 182:15	182:16-20 (context for discussion of this exhibit)		
183:4 - 184:9			
184:13 - 185:7	185:8 (objection)	LR 30(F)	
185:10 - 185:21	185:22 (objection)	LR 30(F)	

ePlus Affirmative Designation	Lawson Fairness Designations/ Summaries	ePlus Objections to Lawson Fairness Designations	ePlus Objections to Lawson Fairness Summaries
186:1	186:2-8 (necessary completion for context of exhibit); 346:17-18, 347:1-349:18; 349:22-351:10 (context for discussion of exhibit)	401/402/403; 116(c)	Incomplete summary; Mischaracterizes testimony; fairness designation is an additional question and answer, not "necessary completion for context of exhibit"
188:3 - 188:4			
188:7 - 188:9	188:10-16 (context for discussion of exhibit)		
188:17 - 190:11	190:12-13 (objection)	LR 30(F)	
190:14 - 190:15	191:1-12	401/402/403; LR 30(F)	
191:21 - 192:11	192:12, 192:14-15 (necessary completion to discussion of exhibit)		Incomplete summary; Mischaracterizes testimony; fairness designation is an additional question and answer, not "necessary completion to discussion of exhibit"
193:7 - 193:20	193:21-22 (objection)	LR 30(F)	
194:1 - 194:11	194:12-13 (objection)	LR 30(F)	
194:14 - 194:18	194:19-20 (objection)	LR 30(F)	
194:22 - 195:2	196:2, 196:4-7 (context for discussion)		
196:8 - 196:22			
197:4 - 197:10	198:3-11 (fuller answer and context for question)		
199:18 - 199:20			
200:1 - 200:4			
200:8 - 201:14			
201:19 - 203:1	203:2 (objection)	LR 30(F)	
203:5 - 203:17	203:18-21 instruction to witness not to discuss substance of conversations with counsel)	LR 30(F)	
206:12 - 206:16	206:17 (objection)	LR 30(F)	
206:18 - 206:21	206:22-207:1 (objection)	LR 30(F)	
207:3 - 207:11	207:12-14 (more complete answer to question and context)	401/402/403	
207:22 - 208:1			
208:4 - 208:9	208:10-11 (objection)	LR 30(F)	
208:13 - 208:14	208:15-17, 208:19 (context for answer)		
208:20 - 209:1	209:2-3 (context for answer)		
209:20 - 210:6			
210:12 - 210:20			
211:3 - 211:6			
211:10 - 211:12	211:13-212:1, 212:4-8 (context for exhibit and discussion; objection), 343:9, 343:21-345:16, 346:1-16 (context for discussion of exhibit)	401/402/403; 116(c)	

ePlus Affirmative Designation	Lawson Fairness Designations/ Summaries	ePlus Objections to Lawson Fairness Designations	ePlus Objections to Lawson Fairness Summaries
212:9 - 212:13	213:7-15 (objection to presentation of whole exhibit)	LR 30(F)	
213:19 - 214:6	214:7-15 (objection)	LR 30(F)	
214:18 - 214:22	215:1 (objection)	LR 30(F)	
215:2			
216:5 - 216:8	18:9-20:4, 215:19-216:4 (context for whole discussion of exhibit)		
216:11 - 216:15			
217:4 - 217:10			
217:20 - 218:9	217:11-19 (context for exhibit)		
218:14 - 219:5	219:6 (objection)	LR 30(F)	
219:8 - 219:9	219:10-13 (context for discussion)		
219:14 - 219:19	219:20 (objection)	LR 30(F)	
219:21 - 220:3	220:4 (objection)	LR 30(F)	
220:5 - 220:8	220:11-15, 220:17-20 (context for discussion)		
220:21 - 221:6	221:7-12 (context for discussion)		
229:8 - 230:1	230:2-231:4, 231:6-11 (context for exhibit)	401/402; 403 (waste of time)	
231:12 - 232:9	235:4-11 (context for discussion)		
233:10 - 233:14			
238:18 - 238:21			
244:22 - 245:8			
245:12 - 245:18	245:19-246:3, 246:5-6 (context for answers and for exhibit discussion)	401/402/403 (cumulative)	
246:11 - 246:13	246:14 (objection)	LR 30(F)	
246:15 - 247:7			
250:16 - 251:8	251:9 (objection)	LR 30(F)	
251:10 - 252:2	252:3 (objection)	LR 30(F)	
252:4 - 252:9	252:10 (objection)	LR 30(F)	
252:11 - 252:14			
253:5 - 253:12			
253:21 - 254:4	254:5 (objection)	LR 30(F)	
254:6 - 254:7			
254:10 - 254:11			
254:14 - 254:16	254:18-21 (context for discussion of exhibit)	401/402/403	Incomplete summary; Witness testified immediately afterward that he is copied on the email chain
254:22 - 255:1	255:2-5 (objection)	LR 30(F)	
255:6 - 255:22	256:18-20 (objection)	LR 30(F)	
256:11 - 256:17			
257:1 - 257:10	257:11-12 (objection)	LR 30(F)	
257:13 - 257:18	257:19-21, 258:4-8 (context for answers as to exhibit)	401/402/403 (cumulative)	

<i>ePlus Affirmative Designation</i>	Lawson Fairness Designations/ Summaries	<i>ePlus Objections to Lawson Fairness Designations</i>	<i>ePlus Objections to Lawson Fairness Summaries</i>
259:2 - 259:8	259:13-20 (context for discussion of exhibit)		
259:21 - 260:15	260:16-20 (context for discussion)	LR 30(F)	
260:21 - 261:9	261:10-12 (context for discussion of exhibit)		
261:13 - 262:13			
263:9 - 263:12			
265:9 - 265:15			
267:7 - 267:9			
267:17 - 267:22	268:1-11 (context for discussion of exhibit)	401/402/403	
268:12 - 269:4	269:5-7, 269:10-13 (context for discussion)		
269:14 - 269:16	269:18-19 (objection)	LR 30(F)	
269:22 - 270:1			
271:13 - 272:10	272:11-12 (objection)	LR 30(F)	
272:14 - 272:22	273:1-12 (context for discussion of exhibit)		
273:13 - 273:16	274:20-275:8 (context for discussion)		
275:9 - 276:6	276:7-12 (context for discussion)		
278:17 - 279:9			
282:11 - 282:17			
285:22 - 286:7	286:8 (objection)	LR 30(F)	
286:9 - 286:10	282:18-285:21 (context for discussion; objections)	LR 30(F); 401/402; 403	Mischaracterizes testimony; designations refer to discussion conducted completely between counsel, not context for discussion about communication from Mr. Debes
286:12 - 286:14			
287:2 - 287:14			
288:6 - 288:14	288:15-17, 289:19-22, 290:16-291:7 (context for discussion of exhibit)	401/402/403 (cumulative)	
288:22 - 289:14	289:15 (objection)	LR 30(F)	
289:17 - 289:18			
290:1 - 290:4	290:5 (objection)	LR 30(F)	
290:6 - 290:15			
291:8 - 292:2			
292:9 - 292:15	292:16-19, 292:21-22 (full context of answer)		
293:1 - 294:5			
300:5 - 300:21	300:22-301:5 (context for discussion of exhibit)		
303:20 - 304:1			
313:1 - 313:3	313:4 (clarification by counsel)	LR 30(F)	
313:5 - 313:6	313:19-21, 314:3-7, 314:19-19 (context for discussion)		

ePlus Affirmative Designation	Lawson Fairness Designations/ Summaries	ePlus Objections to Lawson Fairness Designations	ePlus Objections to Lawson Fairness Summaries
316:1 - 316:17	314:21-315:22 (context for ensuing discussion)		
317:2 - 317:5	317:6 (objection)	LR 30(F)	
317:7 - 317:8			
317:13 - 317:15			
318:2 - 319:8			
319:17 - 320:9	320:10-321:1 (context for answer)		
321:14 - 321:21			
322:8 - 322:14	322:5-7 (context for answer as to meaning of POF); 322:5 (objection)	LR 30(F)	
322:16 - 323:5			
323:12 - 324:11	324:12-13 (objection)	LR 30(F)	
324:15 - 324:16	324:17-325:2 (context for discussion and exhibit); 354:4, 354:7-356:1, 356:6-19, 356:21-357:1 (context for discussion of exhibit)	401/402/403; 116(c)	
325:22 - 326:5			
326:7 - 326:9			
327:19 - 327:20			
328:3 - 328:6			
328:10 - 329:13	329:14 (objection)	LR 30(F)	
329:15 - 330:1			
330:8 - 330:10	330:6-7, 330:16-331:6 (context for discussion and exhibit); 330:11,13 (objection)	401/402, 403 (cumulative); LR 30(F)	Witness clearly testified that the e-mail was sent to Jennifer Langer, not Lawson customer
330:12			
331:14 - 331:16	331:17 (objection)	LR 30(F)	
331:18 - 331:20			
332:8 - 332:20			
333:2 - 333:4			
333:14 - 333:16			
333:20	333:21 (objection); 334:8-12, 334:22-335:4, 337:11-18 (context for discussion of exhibit)	401/402, 403 (waste of time); LR 30(F)	Witness clearly testified that he is referenced in the e-mail and understood the e-mail
333:22 - 334:3			
335:19 - 336:10	336:11-20 (context of discussion of exhibit)	LR 30(F)	Incomplete summary
336:21 - 337:6			
338:12 - 339:7	337:19-338:1 (context for discussion of exhibit)	401/402/403 (cumulative)	
339:21 - 340:11			
340:21 - 341:1	341:2 (objection)	LR 30(F)	
341:3 - 341:21	341:22-342:2 (objection); 342:17-19, 343:1-8 (context for discussion of exhibit)	LR 30(F); 401/402/403; 611 (c)	
342:5 - 342:10			
371:22 - 372:6			

<i>ePlus Affirmative Designation</i>	Lawson Fairness Designations/ Summaries	<i>ePlus Objections to Lawson Fairness Designations</i>	<i>ePlus Objections to Lawson Fairness Summaries</i>
373:7 - 373:21	372:22-373:6, 374:20-22 (context for question and answer); 373:22 (objection)	401/402/403 (cumulative)	
374:8 - 374:13	374:14-15 (objection)	LR 30(F)	
374:16 - 374:19			
375:17 - 376:4	376:5-6 (objection)	LR 30(F)	
376:8 - 376:20	376:21-22 (objection)	LR 30(F)	
377:5 - 377:17			
380:22 - 381:2	381:3 (objection)	LR 30(F)	
381:4 - 381:5			

**Lawson's Objections to Designations in January 6, 2012 Deposition of
Dean Hager**

Plaintiff's Designated Testimony	Lawson's Objections	Lawson's Summary
27:2 – 27:6	403, 611.	Asked and answered.
27:7 – 27:16; 27:19 – 28:5	401, 402, 602, 612.	Relevance; Foundation; Improper attempt to refresh recollection.
30:14 - 30:17	401, 402.	Vague and ambiguous as to "involved in the transition." Argumentative.
34:4 - 34:6	401, 402, 1002.	Witness's recollection of statement is irrelevant; Video, which was produced, is itself the best evidence.
44:9 - 44:11	401, 402, 602.	Vague and ambiguous as to "functional changes." Information is outside witness's personal knowledge.
55:6 - 55:15; 55:17, 55:22 - 56:8, 56:11 - 14	401, 402, 611, 613.	Relevance; Vague and ambiguous as to "right"; Badgering; Improper use of prior statement.
60:2 – 22; 61:3; 61:16 – 64:12	401, 402, 612.	Relevance; Improper refreshment of recollection.
68:2; 68:6 - 69:7; 69:11; 71:5 - 71:7; 71:12 - 71:13	401, 402, 403, 611.	Argumentative; Asked and answered; relevance.
77:13-22	401, 402, 801, 802.	Relevance; Hearsay.
78:17-20	611, 801, 802.	Foundation; Hearsay.
79:20 - 79:21; 80:2 - 80:12; 80:16 - 81:1; 81:3 - 81:9; 81:16 - 81:20; 81:22; 82:21 - 83:6; 84:20 - 85:3; 85:9 - 86:6	602, 611, 801, 802, 901.	Witness has no recollection of these documents and is not a recipient or author; Lack of foundation.
91:6 - 91:10	611.	Misstates the testimony as to replacement cost and time; Argumentative.
92:10 - 92:15	611.	Misstates the testimony as to context of statements made at injunction hearing; Argumentative.
92:21 - 93:1	401, 402, 611.	Argumentative; Vague and ambiguous as to "that testimony."
93:6 - 93:9	401, 402, 611.	Argumentative; Vague and ambiguous as to "the answer that you provided to the Court that day."
98:19 – 99:15	602, 801, 802.	Foundation; Hearsay.

99:13 - 99:15	611.	Argumentative; Vague and ambiguous as to "by May 31, 2011"; Misstates the document as to what the document "contemplat[ed]."
104:3 - 104:8; 104:14-104:19; 105:7 - 105:8	401, 402, 403, 611.	Entire line of questioning as to whether the witness informed the court of redesign after the injunction hearing is irrelevant as to whether the products are more than colorably different or whether there is continuing infringement; Argumentative; Asked and answered.
105:13 - 105:18	401, 402, 611.	Entire line of questioning as to whether the witness informed the court of redesign after the injunction hearing is irrelevant as to whether the products are more than colorably different or whether there is continuing infringement; Argumentative; Vague and ambiguous as to "any efforts."
106:13 – 106:19	401, 402.	Relevance
116:13 - 116:17	401, 402.	Misstates the testimony as to the extent the witness relied on communication with Lohkamp; Vague and ambiguous as to "that."
118:12-19	801, 802.	Hearsay
118:20 - 118:22	401, 402, 403, 611.	Misstates the testimony as to extent the witness relied on communication with Lohkamp. Vague and ambiguous as to "your testimony"; Asked and answered.
120:3 - 120:5	611.	Improper form; Misstates the document as to whether Lohkamp was "asked . . . to make a guess."
120:9	403, 611.	Improper form; Misstates the document as to whether the question was "I know it's a guess"; The question preceded the statement; Argumentative; Asked and answered.
120:12 - 120:14	403, 611.	Misstates the testimony as to the extent the witness relied on communication with Lohkamp; Misstates the document as to whether a guess was requested; Vague and ambiguous as to "your testimony"; Argumentative; Asked and answered.
120:22 - 121:3	403, 611.	Improper form; Misstates the document as to what was asked of Lohkamp; Argumentative; Asked and answered.
130:20 – 131:5	611.	Improper form; Argumentative.
131:12-19	403, 611.	Improper form; Argumentative; Asked and answered.

132:3-8	403, 611.	Improper form; Argumentative; Asked and answered.
133:3 - 133:4	401, 402, 403, 611.	Entire line of questioning as to whether the witness informed the court of redesign after the injunction hearing is irrelevant as to whether the products are more than colorably different or whether there is continuing infringement. Argumentative; Asked and answered.
134:1 - 134:4	611.	Improper form; Argumentative.
146:11 – 13, 17, 22	403, 611.	Asked and answered.
147:21 - 148:2	403, 611.	Improper form; Misstates the testimony as to what was communicated to customers; Asked and answered.
170:4 - 170:5	401, 402, 611.	Improper form; Argumentative; Relevance.
185:6 - 185:7	401, 402, 611.	Improper form; Argumentative; Relevance.
185:20 - 185:21	401, 402, 611.	Argumentative; Relevance.
188:3 - 188:4; 188:7 - 188:9	602, 901.	Witness has no recollection of this document and is not a recipient or author; Lack of foundation.
188:17 - 190:11	602, 901, 801.	Witness has no recollection of this document and is not a recipient or author; Lack of foundation; Hearsay as to whether "Dean's testimony was based on Misstates evidence as to where Keith Lohkamp gave a "guess."
191:21 - 192:12	602, 611, 901.	Witness has no recollection of this document and is not a recipient or author; Lack of foundation.
193:17-20	602, 611.	Foundation; Improper form; Argumentative.
194:15 - 194:18	602, 611.	Foundation; Improper form; Argumentative.
206:12 - 206:16	611.	Improper form; Argumentative; Misstates the document as referencing RQ instead of RQC.
208:7 - 208:9	611.	Improper form; Argumentative.
212:9 - 212:13	602, 901.	Counsel identifies an email on which witness is a recipient and proceeds to ask only about emails on which he is not a recipient without so clarifying; Lack of foundation.
213:19 - 214:6; 214:18 - 214:22; 216:5-6	602, 801, 802, 901.	Witness has no knowledge of emails inquired about, of which he is neither an author nor recipient; Lacks foundation; hearsay; Vague and ambiguous as to product being discussed.
219:3-5	611.	Improper form; Argumentative.
245:5-7	611.	Argumentative.
250:16 - 251:8; 251:10 - 252:2; 252:4 - 252:9	401, 402.	Relevance.
260:21 - 261:9	502, 602.	This portion of the email has been clawed back for redaction as privileged pursuant to the Protective Order.

278:17 – 279:9	401, 402, 611.	Relevance; Argumentative.
282:11-16	602, 611.	Foundation; Argumentative.
286:4 - 286:7	401, 402, 602, 611.	Calls for a legal conclusion; Foundation; Argumentative.
291:8 - 292:2; 292:9 - 292:15; 293:1 - 294:5	602, 901.	Witness has no knowledge of these statements/this document and was neither an author nor a recipient. Lacks foundation.
322:14	602.	Foundation; for speculation as to why J. Langer was making a certain recommendation.
323:12-14; 323:18-21	602.	Foundation
324:7 - 324:11	401, 402, 403, 611.	Entire line of questioning as to statements at the injunction hearing is irrelevant as to whether the products are more than colorably different or whether there is continuing infringement; Argumentative; Asked and answered; Misstates the evidence as to what "your support team was telling you" regarding availability to be shipped.
329:10 - 329:13	401, 402, 611.	Improper form; Argumentative; Misstates the evidence as to whether witness "suggest[ed]" anything; Relevance.
330:8 - 330:10	611.	Argumentative; Misstates the evidence as to "suggesting."
331:14-16	611.	Improper form; Argumentative
333:20	401, 402.	Vague and ambiguous as to which email is being referenced. Misstates the evidence as to several emails on the chain.

340:21 - 341:1	401, 402, 611.	Improper form; Argumentative; Vague and ambiguous as to product and as to functionality; Relevance.
341:18 - 341:21	401, 402, 611.	Improper form; Argumentative; Relevance.
373:19 - 373:21	401, 402, 611.	Vague and ambiguous as to "your counsel's questions."
374:8 - 374:13	401, 402, 611.	Improper form; Argumentative; Misstates the evidence as to why witness was chosen to testify and about what; Relevance.
375:21 - 376:4	602, 611.	Foundation; Misstates evidence as to what witness did to educate himself and as to product; Argumentative.
376:16 - 376:20	403, 602, 611.	Improper form; Argumentative; Misstates the evidence as to knowledge of when product would be "available"; Asked and answered.

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DEPOSITION OF KENNETH FARBER (December 27, 2011)

Lawson Affirmative Designation	<i>e</i>Plus Objection to Affirmative Designations	Lawson Summary	<i>e</i>Plus Objections to Summary	<i>e</i>Plus Fairness Designations	Lawson Counter-Designations	<i>e</i>Plus Objections to Counter-Designations
7:4-17		Farber's role as President of ePlus Systems, Inc. has not changed since trial, and he oversees development, sales, and support of intellectual property.				
9:6-13; 9:25-10:5	LR 30(F)	Farber acknowledges being designated to serve as ePlus's Rule 30(b)(6) witness on the six topics listed on Lawson's Notice of Taking Deposition of ePlus Pursuant to Federal Rule of Civil Procedure 30(b)(6).				
10:8-11:23; 50:7-51:6		Farber did nothing to prepare and educate himself for his 30(b)(6) testimony beyond speaking with outside counsel for forty minutes. He did not investigate any facts.				
14:13-16:14	LR 30(F); 401/403; 106	Farber did not view the jury verdict as a sales opportunity, and nobody at ePlus contacted any Lawson customers in any way in regard to the jury verdict.			16:25-17:5	
22:15-24:5	LR 30(F); 401/403	ePlus provides maintenance, support, and/or service with respect to software sold to customers by third parties; ePlus hires or trains employees to do so.				

Lawson Affirmative Designation	ePlus Objection to Affirmative Designations	Lawson Summary	ePlus Objections to Summary	ePlus Fairness Designations	Lawson Counter-Designations	ePlus Objections to Counter-Designations
28:20-30:10	LR 30(F); 401/403	ePlus did not view the injunction order as a sales or marketing opportunity and never formed a strategy to try to take advantage of the injunction from a business perspective.		28:12-19; 30:11; 30:20-31:10	35:14-37:1	
40:8-41:5	LR 30(F); 401/403	ePlus has no plan or strategy to take advantage in the marketplace of any "final" decree in this matter.				
51:7-52:11; 53:11-19; 53:25-15; 55:4-8; 55:22-56:24; 57:18-58:17; 60:7-14	401/403	Farber assumes that Trinity Health was a Lawson customer for the S3 suite of products. Farber assumes that the Trinity Health customer contacting ePlus was a Lawson pawn, and Farber never spoke to him or discussed him internally.		56:25-57:8	57:9-15	
60:18-61:20	106; 401/403	Except for with Trinity, ePlus had no specific contacts with Lawson customers; although Farber did not ask other employees whether they had such contacts.	Mr. Farber understood that if other employees had contacted Lawson customers, this would have been reflected in the information ePlus collected and produced in discovery			
62:18-64:23	401/403	Farber describes the sales force at ePlus for Procure+ and Content+ and the materials available to them when contacting potential customers.				

Lawson Affirmative Designation	ePlus Objection to Affirmative Designations	Lawson Summary	ePlus Objections to Summary	ePlus Fairness Designations	Lawson Counter-Designations	ePlus Objections to Counter-Designations
65:16-66:24	401/403	ePlus's sales team's marketing materials make no reference to the injunction against Lawson.			73:4-6	LR 30(F)
74:25-76:18	LR 30(F); 401/403	Farber confirms that ePlus could replace RSS with Procure+, which would still run on Lawson's core S3 system.				
78:5-18	401/403; 106	ePlus never considered attempting to make direct appeals to Lawson customers to replace RSS after the injunction issued.				
79:14-16	106; 401/403	ePlus is aware of some of Lawson's customers.				
81:18-85:7; 114:24-122:9	LR 30(F); 401/403	Discussing various customers and whether ePlus had any contact with them after the injunction issued.	The summary mischaracterizes the designated testimony. The designated testimony discusses competition between ePlus and Lawson taking place after the injunction issued.			
89:13-18; 90:6-13	401/403	ePlus's only awareness of the differences between RSS and RQC stems from Farber looking at Lawson's website, at which time ePlus asked counsel and experts to further evaluate.				

Lawson Affirmative Designation	ePlus Objection to Affirmative Designations	Lawson Summary	ePlus Objections to Summary	ePlus Fairness Designations	Lawson Counter- Designations	ePlus Objections to Counter- Designations
93:13-95:18	LR 30(F); 401/403	Farber does not know how Punchout worked in conjunction with the catalog or purchase orders, and there was no digging into its functionality by ePlus.				
99:2-17	401/403	Nobody at ePlus knows whether there is a difference in the ability to search for multiple vendors and create a single requisition between the RSS product and the RQC product. Only counsel or experts have knowledge.				
101:16-104:3	LR 30(F); 401/403	Nobody at ePlus is aware of whether the RSS product or the RQC product have an order list that was separate from a requisition.				
106:5-107:12	401/403	ePlus did not attempt any point to determine what the factual differences are between RSS and RQC other than by looking at Lawson's website.		107:13-19; 107:21-24		
111:14-113:5	401/403	Farber is unaware of how many levels of search could be performed pursuant to the UNSPSC codes in either RSS or RQC or whether it has changed from RSS to RQC.				

Lawson Affirmative Designation	ePlus Objection to Affirmative Designations	Lawson Summary	ePlus Objections to Summary	ePlus Fairness Designations	Lawson Counter-Designations	ePlus Objections to Counter-Designations
124:17-131:7	LR 30(F); 401/403	Farber did not review the Lawson Requisition Center What's New and Different document. ePlus's interrogatory responses regarding UNSPSC code functionality and whether RQC creates an order list separate from the requisition used to generate a purchase order did not originate from a fact witness at ePlus. Nobody at ePlus did any claim analysis between Lawson's products whatsoever.				
131:21-132:5	401/403	ePlus's counsel chose and retained ePlus's experts to analyze Lawson's products.				
132:18-134:5	LR 30(F); 401/403	No analysis was conducted by anyone at ePlus with regard to paragraphs 3 or 4 on the exhibit list to Lawson's Notice of Taking Deposition of ePlus Pursuant to Federal Rule of Civil procedure 30(b)(6).				
136:12-15	106; 401/403	ePlus's counsel states for the record that ePlus will not be seeking lost profits in this contempt proceeding.		154:12-22		
138:6-25	401/403	ePlus's procurement software operated at a loss.				
139:7-17; 140:2-142:6	401/403	ePlus does not track profitability separately by licensing, service, and maintenance.				
144:9-145:17	401/403	ePlus does not track profitability of its procurement products by individual product.			154:23- 155:12	LR 30(F)